

**SUPPORTING STATEMENT FOR FORM SSA-4641-U2
AUTHORIZATION FOR THE SOCIAL SECURITY ADMINISTRATION
TO OBTAIN ACCOUNT RECORDS FROM A FINANCIAL INSTITUTION
20 CFR 416.200, 20 CFR 416.203
OMB No. 0960-0293**

A. Justification

1. *Section 1631(e)(1) of the Social Security Act, as amended, along with 20 CFR 416.200 and 416.203 of the Code of Federal Regulations, authorize the Social Security Administration (SSA) to collect and verify information on applications for the Supplemental Security Income (SSI) program. Form SSA-4641-U2 complies with the authorization and certification requirements of the *Right to Financial Privacy Act of 1978 (12 USC 35, Sections 3402-3404)*, which specifies conditions that must be met before the account records of financial institutions can be disclosed with customer authorization.*
2. Form SSA-4641-U2 provides financial institutions with the applicant, recipient or deemor's authorization to disclose records. The purpose of obtaining the financial institution's records is to verify the existence, ownership, and value of accounts owned by SSI applicants, recipients and deemors. If the records maintained by the individual are incomplete, unavailable, or appear altered, contact with the financial institution is necessary. Once received, the financial institution's report is used, in part, to determine whether SSI resource eligibility requirements are met. Respondents are any financial institutions used by SSI applicants, recipients, and/or deemors.
3. Improved information technology that would reduce the burden is in the process of being developed. An electronic based financial account verification system will help reduce burden and reduce SSI payment errors. However, until this electronic based system has been fully developed, the existing process must be utilized. Moreover, even when SSA is able to develop the electronic system, a paper-based option (using the SSA-4641-U2) will continue to be available for those financial institutions that do not have the capability to respond electronically, or that require a wet signature in order to release financial account information. SSA currently minimizes the burden by sending the form out with pre-filled information.
4. The nature of the information being collected and the manner in which it is collected preclude duplication. There is no other collection instrument used by SSA that collects data similar to that collected here.
5. This collection does not have a significant impact on a substantial number of small businesses or other small entities.
6. If this information is not collected, individuals who are unable to secure necessary

evidence on their own (due to physical, mental, or financial limitations) could be disadvantaged. If the data were collected less frequently, it would create a high risk of incorrect eligibility determinations and incorrect payments of benefits. There are no technical or legal obstacles that prevent burden reduction.

7. There are no special circumstances that would cause this information collection to be conducted in a manner that is not consistent with 5 CFR 1320.5.
8. The 60-day advance Federal Register Notice was published on June 13, 2006, at 71 FR 34184, and SSA has received no public comments. The second Notice was published on September 11, 2006, at 71 FR 53485. There have been no outside consultations with members of the public.
9. The respondents are paid at a rate determined by the Federal Reserve Board in accordance with the Right to Financial Privacy Act of 1978.
10. The information requested is protected and held confidential in accordance with 42 U.S.C. 1306, 20 CFR 401 and 402, 5 U.S.C. 552 (Freedom of Information Act), 5 U.S.C. 552a (Privacy Act of 1974) and OMB Circular No. A-130.
11. The information collection does not contain any questions of a sensitive nature.
12. Form SSA-4641-U2 is used by 500,000 respondents annually. The estimated response time is 6 minutes, for a total of 50,000 burden hours. The total burden is reflected as burden hours, and no separate cost burden has been calculated.
13. There is no known cost burden to the respondents.
14. The annual cost to the Federal Government is approximately \$1,657,073.13. This estimate is a projection of the costs for printing and distributing the collection instrument and for collecting the information. Also, the respondents are compensated for their costs (see Item 9). The FY 2005 reimbursement was \$117,073.13, which has been factored into the above cost.
15. There have been no changes in the public reporting burden.
16. The results of the information collection will not be published.
17. OMB has granted SSA an exemption from the requirement that the expiration date for OMB approval be printed on its program forms. SSA produces millions of public-use forms, many of which have a life cycle longer than that of an OMB approval. SSA does not periodically revise and reprint its public-use forms (e.g., on an annual basis). This exemption was granted so that otherwise useable editions of forms would not be taken out of circulation because the expiration date had been reached. In addition, Government waste has been avoided because stocks of forms will not have to be destroyed and

reprinted.

18. SSA is not requesting an exception to the certification requirements at 5 CFR 1320.9 and related provisions at 5 CFR 1320.8(b)(3).

B. Collections of Information Employing Statistical Methods

Statistical methods were not used for this information collection.