SUPPORTING STATEMENT FOR FORMS SSA-6234 REPRESENTATIVE PAYEE REPORT (FOR REPRESENTATIVE PAYEE ORGANIZATIONS)

20 CFR 404.635, 404.2035, 404.2065, and 416.665

OMB No. 0960-0691

A. <u>Justification</u>

1. In certain cases, the Social Security Administration (SSA) may determine that it is not in beneficiaries' best interest to receive their payments directly. As per *Section 1631(a)* of the *Social Security Act* and sections *20 CFR 404.635*, *404.2035*, *404.2065*, and *416.665* of the *Code of Federal Regulations*, in such cases SSA can designate a family member or other person or organization to act as the representative payee for beneficiaries. In this capacity, the person or organization receives the SSA beneficiary's payments directly and manages these payments.

As part of its stewardship mandate, SSA must ensure that organizational representative payees are using the payments they receive for the beneficiary's benefits. The Agency gathers the information necessary to make this assessment through form SSA-6234, the Representative Payee Report (Organizations).

- 2. SSA uses the information collected by form SSA-6234 to determine if organizational representative payees are using funds received from SSA in the best interests of the beneficiaries whom they represent.
- 3. Form SSA-6234 is not currently available electronically under the Agency's Government Paperwork Elimination Act plan. However, it is being evaluated by SSA for electronic conversion as part of an overhaul of the electronic payee accounting process. As part of this multi-year process, this form will eventually be made electronic.
- 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 significantly impact small businesses or other small entities.
- 6. If this information were not collected, SSA would have no means of ensuring that organizational representative payees are using the money they receive from SSA for the beneficiary's benefit. Since the information is only collected annually and reflects the past year's use of SSA benefits, it cannot be collected less frequently.

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 for this collection published on October 2, 2006 at 71 FR 58041, and no public comments were received. The 30-day Federal Register Notice published on February 1, 2007, at 72 FR 4764. We will submit any public comments to OMB as we receive them.

There have been no outside consultations with members of the public.

- 9. SSA provides no payment or gifts to the respondents outside of payments for the beneficiary.
- 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. A projected 750,000 representative payees complete these forms annually. With a response time of 15 minutes, the annual burden is 187,500 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 \$3,500,000. This estimate is a projection of the costs for printing and distributing the collection instrument and for collecting the information.
- 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 larger 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. <u>Collections of Information Employing Statistical Methods</u>

Statistical methods are not used for this information collection.

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