

**SUPPORTING STATEMENT FOR FORM SSA-8203-BK
STATEMENT FOR DETERMINING CONTINUING ELIGIBILITY
FOR SUPPLEMENTAL SECURITY INCOME PAYMENTS**

20 CFR 416.204

OMB #0960-0416

A. Justification

1. *Title XVI, part A, section 1611(c)(1)* of the Social Security Act requires that "... eligibility for and the amount of [Supplemental Security Income (SSI)] benefits ... shall be redetermined at such time or times as may be provided by the [Commissioner]."

Subpart B, 20 CFR 416.204, of the regulations provides that redeterminations (RZs) will be made periodically on a scheduled basis or when the Social Security Administration (SSA) is informed of a change which would affect an SSI recipient's continued eligibility or payment amount.

2. SSA employees conduct telephone or face-to-face interviews with SSI recipients and representative payees of SSI recipients and document the information gathered during the interview on Form SSA-8203-BK. The information is used in high-error probability (HEP) RZ cases to determine whether SSI recipients have met and continue to meet all statutory and regulatory requirements for SSI eligibility, and whether they have been and are still receiving the correct payment amount. Periodic collection of this information is the only way SSA can make these determinations.

3. SSA also collects this information during personal interviews by using the computerized Modernized SSI Claims System (MSSICS), which documents information gathered from the recipient and provides printed redetermination output for the recipient's signature. While more than 90 percent of the HEP cases are redetermined using MSSICS at this time, approximately 10 percent of cases continue to be redetermined using the paper form. We conduct electronic interfaces with records of other government entities to determine whether there are conflicts between the information we have on our system of records and other government entities; however, any conflicting information we get through these sources must be verified with the SSI recipient. Under the current agency's Government Paperwork Elimination Act (GPEA) plan the SSA-8203 is not scheduled for complete electronic implementation because of the high risk of payment error.

4. Some, but not all, of the information collected on Form SSA-8203-BK is also collected on Form SSA-8202-BK. Form SSA-8202-BK is used to conduct RZs on middle-error

and low-error probability (MEP and LEP) RZ cases either during personal contact interviews conducted by SSA field office personnel (for MEPs), or as a self-help form that the respondent completes without assistance from SSA employees (for LEPs).

The SSA-8202 does not elicit enough information to make accurate determinations of continuing eligibility and payment amount in HEP RZ cases.

Form SSA-8202-OCR-SM (Self-Mailer), the simplest of the three forms, collects information similar to that collected on Form SSA-8202-BK. The SSA-8202-OCR-SM is a self-help form containing 16 questions; the Form SSA-8202-BK contains 17 questions and Form SSA-8203-BK contains 29 questions. Form SSA-8202-OCR-SM is used exclusively for LEP RZs, and its questions are less detailed than those of the other two redetermination forms. It is mailed on a 6-year cycle to recipients who complete it without personal contact interviews and has been found to be very cost effective. Form SSA-8202-OCR-SM serves a different purpose than either Form SSA-8202-BK or Form 8203-BK. In summary, the three forms are used for different purposes. There is no other similar information or data that can be used or modified for this purpose.

5. This collection does not significantly impact a substantial number of small businesses or other small entities.
6. If HEP RZs were conducted less frequently and information was collected using a less detailed form, potential eligibility or events affecting payments might remain undetected for an extended period of time. Recipients would be adversely affected by underpayments, which would deprive them of necessary funds owed to them, and by overpayments, which would result in collection activities. 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 inconsistent with 5 CFR 1320.5.
8. The 60-day advance Federal Register Notice was published on December 15, 2006 at 71 FR 75607, and SSA received no public comments. The second Notice was published on March 14, 2007 at 72 FR 12244, and to date SSA received no public comments.

There have been no outside consultations with members of the public.
9. SSA provides no payment or gifts to the respondents.
10. The information collected on this form 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. The below chart represents the estimated annual burden associated with this collection activity:

Collection Method	Number of Respondents	Frequency of Response	Average Burden per Response	Estimated Annual Burden Hours
MISSICS	109,012	1	20 minutes	36,337
MISSICS/ Signature Proxy	36,338	1	19 minutes	11,507
Paper	25,650	1	20 minutes	8,550
Totals:	171,000			56,394

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 \$11 million which includes printing, postage, envelopes, and SSA staff time. However, according to SSA's quality assurance dollar impact data, the benefit achieved in terms of prevented/collected overpayments and paid/prevented underpayments is approximately \$1.6 billion.

15. There are no changes in the public reporting burden.

16. The results of the information collected will not be published.

17 OMB has granted SSA an exemption from the requirement to print the reports clearance expiration date on its forms. SSA produces millions of public-use forms, many of which have a life cycle longer than that of an OMB clearance. SSA does not periodically (e.g., on an annual basis) revise and reprint its public-use forms. This exemption was granted to avoid making otherwise useable editions of forms obsolete only because the expiration date had been reached. In addition, Government waste has been avoided because stocks of forms would not have to be destroyed and reprinted.

18. SSA is not requesting an exception to the certification requirements.

B. Collections of Information Employing Statistical Methods

Statistical methods are not used for this information collection.