

**Supporting Statement for Form SSA-624  
Representative Payee Evaluation Report  
20 CFR 404.2065 and 416.665  
OMB No. 0960-0069**

**A. Justification**

1. *Sections 205(j) and 1631(a)(2) of the Social Security Act (the Act) provide that benefits may be certified to a relative, another person or an organization interested in or concerned about the welfare of the beneficiary, when the Social Security Administration (SSA) determines it is not in a beneficiary's best interest to receive benefits directly. These individuals and organizations are called representative payees. Sections 205(j)(3) and 1631(a)(2)(C) of the Act authorize SSA to monitor and verify (in certain situations) how payments are used by the representative payees. Representative payees (except State mental institutions participating in SSA's triennial onsite review program) are required to report to SSA in writing at least once per year to explain how the funds they have received have been used and conserved. These payee reportings are usually achieved via the payee's completion of the Representative Payee Report forms, SSA-623, SSA-6230, SSA-6234, and SSA-6233. Each of these report forms targets a different type of payee. The appropriate form is mailed to the payee for completion. The collection of periodic written reports from representative payees is authorized under 20 CFR 404.2065 and 416.665 of the Code of Federal Regulations.*
2. SSA field offices (FO) are required to conduct a face-to-face interview using an SSA-624 with the representative payee when (1) the payee's responses on the annual accounting report (SSA-623/6230, OMB No. 0960-0068) are unacceptable and cannot be resolved or a change in custody has occurred; (2) the payee fails to complete the initial and second request for an annual accounting report; and (3) conducting random reviews under the Expanded Monitoring Program (see below). In addition to the payee, the beneficiary and custodian (if other than the payee) are also interviewed (face-to-face not required) to confirm information provided by the payee and to ensure the beneficiary's current needs are being met. FOs complete a Representative Payee Evaluation Report, SSA-624, to document the interviews, their evaluation of the payee's continued suitability to serve as rep payee, and action taken as appropriate. Respondents are individuals and organizations which act as representative payees who fail to adequately comply with SSA's statutory annual reporting requirement for representative payees for Title II and Title XVI beneficiaries.
3. FOs complete the paper SSA-624 based on a face-to-face interview with the representative payee. The form is not available to representative payees and must be filled out by a field office representative; therefore, SSA has not scheduled this form for electronic implementation via the Internet.

4. The nature of the information being collected and the manner in which it is collected preclude duplication. There is no other representative payee evaluation report in use by SSA that collects this data.
5. The collection of information could have an impact on small businesses serving as representative payees. However, we have minimized the burden by incorporating Yes and No responses where feasible.
6. Accounting information is collected annually from representative payees. This statutory requirement is the result of a class action suit filed against SSA (Jordan v. Bowen), and, therefore, the information must be collected. In addition, SSA also collects this information during the random reviews, an initiative under the Expanded Monitoring Program. There is continued Congressional interest on initiatives designed by SSA to improve the representative payment monitoring process. For these reasons, the information cannot be conducted less frequently.
7. There are no special circumstances that would cause the SSA-624 to be used in a manner that is inconsistent with the guidelines in 5 CFR 1320.5.
8. The 60-day advance Federal Register Notice was published on May 9, 2007 at 72 FR 26443, and SSA has received no public comments. The second Notice was published on August 7, 2007, at 72 FR 44211. There have been no outside consultations with members of the public.

*The annual burden reported in the first and second Federal Register Notices did not take into account that SSA will no longer be using the SSA-624 for the random review process now that OMB has approved the use of the SSA-639 (0960-0633) for that purpose. At the time that the Federal Register Notices were published, OMB had not, yet, approved this program change, and, therefore, we did not report it. Now that the change has been approved we have reduced the burden for the SSA-624 accordingly since the 2000 respondents which are part of the random review process are now using the SSA-639. The corrected burden is reported in #12 below and on ROCIS.*

9. SSA provides no payment or gifts to the respondents.
10. The information provided on the SSA-624 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 SSA-624 does not contain any questions of a sensitive nature.
12. FOs use form SSA-624 annually for approximately 250,000 respondents. The estimated time to complete the SSA-624 is 30 minutes. The total burden is

125,000 hours. Based on data collected in January 2007, it is estimated that these figures are broken down by respondent type as follows:

Type of Respondent	Number of Respondents	Frequency of Response	Average Burden Per Response	Total Annual Burden
Individuals	181,320	1	30 minutes	90,660 hours
State/Local Governments	7,900	1	30 minutes	3,950 hours
Businesses	60,780	1	30 minutes	30,390 hours
Total	250,000			125,000 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 \$1,164,240. This estimate is a projection of the costs for printing and distributing the collection instrument and for collecting the information.
15. The decrease in the public reporting burden is due to the replacement of the SSA-624 with the SSA-639 for the 2000 random interviews which are conducted annually (also see addendum).

The increases shown in ROCIS are due to the addition of the two ICs which were necessary in order to show the burden per type of respondent (Individuals, Businesses, and Local/State Government). Before ROCIS we did not have the ability to split the burden amongst these three types of respondents and, therefore, only reported one burden. Now that we have the ability to show the burden in this way, we have done so in ROCIS.

Also, please note that in the two new ICs I was unable to accurately make the numbers for the program change negative and still show the correct amounts in the Change Due to Agency Discretion column. Please consider revising the ROCIS system to accommodate a fix for this issue.

16. The results of the information collection will not be published.
17. OMB has granted SSA an exemption from the requirement to print the OMB 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 approval. SSA does not periodically (e.g., on an annual basis) revise and reprint its public-use forms. This exemption was granted to avoid confusion by having in circulation otherwise useable editions of forms obsolete only because the expiration date has been reached. In addition, Government waste has been avoided because stock forms would 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 are not used for this information collection.