

## **OMB Questions Regarding Revisions to the SSA-4641**

### **1) How will claimants/benes get this form?**

Response: This is not a self-help form. Claimants do not complete it and obtain information on their own. The form is completed by an SSA representative and sent to the financial institution by SSA and returned directly to SSA. The claims representative who is completing the initial claim or redetermination will provide the form for the individual's signature.

OK

### **2) Where are the form instructions for the portion of the form benes have to fill out?**

Response: Claimants/beneficiaries do not have to complete any portion of the form other than their signature. Individuals typically sign the form in the presence of a claims representative (who can provide instruction if necessary) and thus additional instructions are not viewed as necessary. This form has never contained instructions for the individual since the claims representative completes all relevant information on page 1 except for the individual's signature.

Note: The format used in the revised SSA-4641 is patterned after the SSA-4640 which is used for the Medicare Part-D program. The SSA-4640 was approved by OMB in August, 2006.

OMB Question: OK, except in cases where the form is mailed to benes, then it would appear that some kind of instruction should be provided to the bene. What are benes told in these cases?

#### SSA Response:

As outlined in the addendum to the supporting statement, the SSA-4641 is being modified due to legislative and regulatory changes. Those legislative and regulatory changes allow SSA to obtain a permanent authorization to access financial institution information for SSI applicants, recipients, and deemors. The Agency is currently collecting permanent authorizations on all initial claims and MSSICS redeterminations. The SSA-4641 is not used to collect permanent authorizations. Permanent authorizations are collected as a part of the initial claim and redetermination process.

The collection of permanent authorizations allows the Agency to move towards an electronic financial account verification process. Under the electronic process, the primary function of the SSA-4641 will be to serve as an electronic template that will be sent to a financial institution. With the electronic verification process, the paper SSA-4641 will only be used in rare situations where a financial institution requires a wet signature. In those instances, the paper SSA-4641 will likely be completed in-person with the assistance of a claims representative. If a paper SSA-4641 would need to be mailed to an applicant, recipient, or deemor, a note would be attached informing the individual to read page one of the document and to sign where indicated.

#### **a. Where are benes supposed to turn this form in?**

Response: The claims representative takes the form after the individual has signed it and forwards it directly to the financial institution. In cases where the form is mailed to the individual to obtain their signature, a pre-addressed return envelope is provided to the individual to return it to SSA.

OMB Question: OK, except in cases where the form is mailed to benes, then it would appear that some kind of instruction should be provided to the bene. What are benes told in these cases? Are they just told to "sign here?" Since the bene is authorizing the disclosure of

financial information, there should be some kind of letter explaining what the bene is actually agreeing to by signing the form.

SSA Response:

See response above.

Note: The Agency has used the existing SSA-4641 for many years. During that time, we have never received any feedback from the public or our field offices indicating that individuals were confused or had difficulty understanding or completing the form. Moreover, under the electronic process, the SSA-4641 will rarely be used in paper form and thus an emphasis was made to revise the form to make it more conducive to the electronic process. FYI, under the electronic process, "Permission on File" will be inserted into the customer's authorization block. Section 213 of the Foster Care Independence Act of 1999 (P.L. 106-169), allows SSA to request financial account information without furnishing the financial institution with a written authorization.

**b. How are they supposed to get the SSA rep's signature at the bottom of the form? Do they mail in the form first and then have the SSA rep sign off on it? Or are they supposed to bring this form into the SSA office? It's not clear.**

Response: The form is typically completed in the SSA field office by SSA personnel and the claims representative will sign the form after the individual has provided their signature. If the form is returned by mail in the envelope provided by the field office after the claimant signs the form, the SSA representative will then sign the form after he/she receives it and forward it to the financial institution.

OK

**c. Do claimants need to fill out a form for every financial institution they do business with? This should be made clear**

Response: If forms are needed for more than one financial institution, the claims representative will prepare the forms for the individual's signature.

OMB Response: OK, but then the wording on the form should be changed (see attached).

SSA Response: We agree with the suggested change.