Supporting Statement for Form SSA-8000-BK Application for Supplemental Security Income 20 CFR, 416.207 & 416.305- 335, Subpart C OMB No. 0960-0229

A. Justification

- 1. Section 1631(e)(1) of the Social Security Act (the Act) requires the Commissioner of Social Security to promulgate regulations concerning applications for Supplemental Security Income (SSI) benefits. Section 20 CFR, 416.207 and 416.305-.335 provides that the collection of information requested for SSI benefits be on a prescribed form.
- 2. The Social Security Administration (SSA) uses the information gathered on Form SSA-8000-BK to determine whether claimants meet all statutory and regulatory requirements for SSI eligibility and to determine the amount of such benefits. SSA employees secure this information during interviews conducted with members of the public who wish to file for SSI benefits.
- 3. Implementation under the Government Paperwork Elimination Act is unknown, due to a high risk of payment error. SSA uses online computer technology via the Modernized SSI Claims System (MSSICS) to document information secured from the claimant. Applications taken through MSSICS do not ask questions that are not relevant to the applicant. We believe that using MSSICS improves accuracy in recording responses, results in fewer recontacts to clarify an applicant's response, and reduces overall interviewing time. However, SSA will continue to secure information through the use of the paper application form for approximately two percent of the claims in case of a temporary computer failure and because MSSICS has some limitations to its use.
- 4. Form SSA-8000-BK (full application) and Form SSA-8001 (abbreviated application), Application for Supplemental Security Income (*OMB No. 0960-0444*) are both used to collect this type of information. However, only one form is completed per respondent. Therefore, information is collected only once.
- 5. This collection does not have a significant impact on a substantial number of small businesses or other small entities.
- 6. The information must be collected at the time the claimant expresses an interest in filing for SSI benefits. If the claimant is prevented from filing at that time, there is a potential loss of SSI eligibility and in some States, Medicaid benefits. In addition, any delay in securing the information

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would result in a delay in determining eligibility and making the initial payment if the claimant is eligible. Because SSI is a program based on need, delays of this nature are contrary to the intent of the program. 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 March 26, 2008, at 73 FR 16087, and SSA has received no public comments. The second Notice was published on June 11, 2008, at 73 FR 33138, and SSA has received no public comments.
- 9. SSA provides no payment or gifts to the respondents.
- 10. The information requested 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 information will be collected from approximately 1,281,260 respondents annually for a total burden of 752,266 hours.

Approximately 98 percent of the claims are MSSICS claims (i.e., claims taken during a personal interview), and 89 percent use Signature Proxy. Signature Proxy allows an SSA employee to sign the claim with the consent of the applicant. The burden information is shown in the chart below:

Type of	Number of	Frequency of	Average	Total Annual
Response	Respondents	Response	Burden Per	Burden
			Response	(hours)
			(minutes)	
Paper	25,625	1	41	17,510
MSSICS	138,120	1	36	82,872
MSSICS	1,117,515	1	35	651,884
w/				
Signature				
Proxy				
Totals	1,281,260			752,266

The total burden is reflected as burden hours, and no separate cost burden has been calculated.

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- 13. There is no known cost burden to the respondents.
- 14. The annual cost to the Federal Government for the paper application form is approximately \$352,856. This estimate is a projection of costs for printing and distributing the form and for collecting the information.
- 15. The annual reporting burden has increased because the number of applications has increased. That increase can be attributed to the economic downturn (i.e. increase in applications and therefore, increased burden hours).
- 16. The results of the information collected will not be published.
- 17. OMB has granted SSA an exemption from the requirement that the OMB expiration date 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 clearance. 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 are not used for this information collection.

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