

**Addendum to the Supporting Statement for
Forms SSA-7161-OCR-SM and SSA-7162-OCR-SM
Report to United States Social Security Administration by Person
Receiving Benefits for a Child or for an Adult Unable to Handle Funds;
Report to United States Social Security Administration
OMB No. 0960-0049**

Terms of Clearance:

The Terms of Clearance placed upon the ICR for 0960-0049 on 8/13/07 are as follows:

Approved for one year only since a plan for making this form electronic was not received, as per previous terms of clearance. Upon resubmission of this form for OMB approval, SSA will either make this form electronically available or provide a plan for when SSA intends to make this form electronically available. Included in that plan should be an explanation of the criteria SSA uses to determine which forms receive priority consideration for electronic conversion. As the respondents to this form reside overseas, this form seems like an especially good candidate for electronic conversion. If it not made available electronically on resubmission, SSA will specifically include an explanation why this form was not considered a priority despite the fact that respondents reside overseas. As this information was requested per previous terms of clearance, future submissions that omit this information will be returned as improperly submitted.

SSA's Office of International Programs is extremely concerned about the scope of the program information that would be available to the public if SSA released the SSA-7161-OCR-SM and SSA-7162-OCR-SM electronically. We strongly oppose the electronic form availability because it would create insufficient SSA staff oversight and involvement of the Foreign Enforcement Program. Availability of the electronic forms would undermine the verification and accuracy of the information, breaching the integrity of the SSA program abroad.

The Foreign Enforcement Program (FEP) is one of the most important integrity measures used by the Social Security Administration (SSA) to verify the existence and identity of beneficiaries living outside the United States. Contacts are made annually or biennially using two Foreign Enforcement Questionnaires (FEQs) the SSA-7161-OCR-SM and the SSA-7162-OCR-SM. The purpose of the FEP is to:

- Verify that the beneficiary is alive;
- Obtain information and documentation regarding events that may result in suspension, reduction and/or termination of benefits; e.g., change in citizenship, marriage, divorce, etc.;
- Obtain an annual accounting report from the representative payee;
- Verify that there has been no change in custody for the incapable beneficiary; and
- Gather data for use in administering the Social Security Program outside the U.S.

The mailing and receipt of these questionnaires ensures that our beneficiaries in foreign countries are receiving SSA notices and other important information, and allows SSA to obtain assurance of free access to our beneficiaries, which is integral to the soundness of the program.

With mandatory use of direct deposit, the FEQs are our only contact with the beneficiary to confirm his or her physical presence. SSA already knows that people outside the U.S. are fraudulently using U.S. addresses when receiving benefits through direct deposit in order to avoid alien tax provision penalties. We do not want to lose the ability to monitor their physical presence, which would be negatively impacted by the electronic implementation of the FEQs.

To allow beneficiaries to complete the FEQs electronically online would sacrifice our only method of keeping track of the physical presence of beneficiaries and would put the integrity of the foreign Social Security program at risk.

We emphasize again our concern over releasing the forms electronically, since it would create insufficient staff involvement to verify the accuracy of the information received from foreign beneficiaries. Routine and wide circulation of the forms would undermine the review process and would initiate potential fraud and abuse of the system.