

Supporting Statement for Form SSA-8508 BK
Supplemental Security Income (SSI)-
Quality Review Case Analysis
OMB No. 0960-0133

A. Justification

1. Authority for quality review (QR) of the Supplemental Security Income (SSI) payment process is found in *section 1631(d)(1)* of the *Social Security Act (the Act)*, which indicates that provisions of *section 205(a)* of *the Act* apply under Title XVI to the same extent as under Title II. *Section 205(a)* of *the Act*, in turn, specifies that the Commissioner of Social Security "...shall adopt reasonable and proper rules and regulations to regulate and provide for the nature and extent of the proofs and evidence and the methods of taking and furnishing the same in order to establish the right to benefits hereunder." More specifically, *section 1631(e)(1)(B)* of *the Act* provides that eligibility for SSI payments will not be determined solely based on declarations by the applicant, but will be verified from independent or collateral sources. This section further provides that additional information be obtained as necessary to assure correct eligibility and payment amount. In addition, *section 1611(c)(1)* of *the Act* provides that "...eligibility for and the amount of such benefits shall be redetermined at such time(s) as may be provided by the Commissioner of Social Security."
2. SSA employees collect this information during a personal interview with the respondent. The information collected on Form SSA-8508-BK provides an ongoing assessment of the effectiveness of the SSI program, including the effect of incorrect payments. This form is designed to solicit information which depicts the condition of the program in terms of its operating efficiency and the quality of its underlying policies. Particular emphasis is placed upon detecting the extent of both administrative and recipient deficiencies as they contribute to incorrect payments. Analysis of the data describing deficiencies discovered by this quality review sample is critical to the decision-making process for determining corrective action to reduce incorrect payments. SSA also uses data collected through this process to establish a Federal payment accuracy rate, which is used as one of the performance measures for the Agency's service delivery goals. Respondents are recipients of Supplemental Security Income.
3. Improved information technology that would reduce the burden is not available. Currently SSA has no plans to create an electronic version of Form SSA-8508-BK due to its low volume of usage.
4. Duplication of information on Form-SSA-8508-BK is inherent (and necessary) in this process, because the data collected is used to verify information of record.
5. This collection does not have an impact on small businesses or other small entities.
6. Failure to collect information using Form SSA-8508-BK on an ongoing basis would compromise the Agency's ability to monitor the accuracy and effectiveness of the SSI program efficiently. Information about error rates, deficiency trends, training needs, policy

inequities, data collection problems, etc., should be discovered and made available as soon as possible in order to ensure timely corrective action. There would be no way to establish national accuracy rates or to develop profiles for improving the redetermination process without the information gathered on this interview form. In addition, it would be more difficult to make recommendations for corrective action. Therefore, this information collection cannot be conducted less frequently. 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 June 11, 2008 at 73 FR 33138 and SSA has received no public comments. The second Notice was published on August 22, 2008 at 73 FR 49730. There have been no outside consultations with members of the public.

The First Federal Register Notice contained inaccurate burden information. We have corrected this in the Second Notice and in #12 below.

9. SSA provides no payments or gifts to 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.

Information about a sampled individual will not be released by SSA unless the recipient first gives permission for such release. The sampled individual is advised accordingly in a letter announcing his/her selection for an SSI quality review, and the reviewer also verbally explains this assurance of confidentiality and any exceptions at the time of the interview. All disclosures made in completing the Form SSA-8508-BK review are recorded on a QR Collateral Contact List Record of Disclosure (SSA-8538) and maintained by the reviewing office for at least 5 years from the date of disclosure.

11. The information collection does not contain any questions of a sensitive nature.
12. Form SSA-8508-BK will be used by approximately 4,500 respondents annually. The estimated average response time is 60 minutes, for a total of 4,500 burden 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 \$1.07 million. This is derived by adding travel cost per case to the administrative cost per case times 4,500, i.e., \$52.00 + \$37.00 * 3,900.
15. There are no changes in the public reporting burden.
16. A report based on Form SSA-8508-BK findings is published at the end of each sample period. A

typical report presents the national payment accuracy rate for the sample period and provides a comparison of the new accuracy rate established for previous periods. It also presents deficiency dollar information by program area, including comparison of current and previous deficiency data

Error data are broken down into overpayments and underpayments and further analyzed in terms of the five eligibility elements most often involved. An additional distinction is made between those deficiencies which should be subject to a high degree of control by SSA, or which result from failure of SSA to properly discharge its responsibilities, and those which result from failure of the recipient to fully and accurately report information to SSA. Finally, specific data about the deficiency's source (e.g., failure to report a change, incorrect determination, systems failure) is provided within each of these two categories of responsibility.

17. OMB has granted SSA an exemption from the requirement that the expiration date for OMB approval 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 form 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. Please note, however, that statistical survey methodology is not used for this information collection.

B. Collection of Information Employing Statistical Methods

1. The sample universe is made up of about 7 million recipients. Since sample reviews using Form SSA-8508-BK were first begun in September 1973, at least 95 percent of each sample has been successfully completed. There is no reason to expect a change in future response rates.
2. The sample is a stratified cluster sample. Within each region, field offices (FO) are grouped into three clusters based on estimated costs for Quality Assurance reviewers to travel to the office. All FOs in cluster 1 are subject to selection, while simple random samples of the offices in clusters 2 and 3 are selected. Cases are sampled from the selected FO in each cluster by using a random number generator and a sampling fraction. Since the probability of selection varies by region and FO cluster, the final sample data are weighted to produce regional and national data.

Form SSA-8508-BK information is collected and reported on an annual cycle, and the reported data can be generalized to the sample universe with a confidence level of 95 percent within a range of plus or minus 3 percent for the nation.

3. Respondents' cooperation is initially solicited by mailing an advance notification letter, a return contact sheet, and a Form SSA-97 (a checklist for the respondents' use), OMB Control No. 0960-0432. Whenever a reviewer encounters an uncooperative respondent, FO assistance is solicited, and the case may be reassigned to another reviewer. If this does not result in a successful completion of an interview with the potential respondent, FO casefile

material may be requested and, if it contains sufficient information, this should be used in lieu of the recipient interview. Only after all reasonable alternatives have been explored is the reviewer allowed to exclude a case from the sample. The sample size allows for a reasonable number of exclusions without affecting confidence levels. Whenever the sampled individual cannot be located, FO assistance is requested to find the recipient. If the FO cannot locate the recipient, payments are suspended pending further investigation. This is one of SSA's payment safeguards.

4. No formal testing of Form SSA-8508-BK information collection and reporting methods is being undertaken at this time.
5. Richard Lehigh is the Agency's statistician responsible for reviewing and approving the statistical aspects of the survey design. He can be reached at (410) 965-2788.

The Office of Quality Performance (OQP) collects, analyzes and reports on the information obtained from the review.