SUPPORTING STATEMENT FOR:

• FORMS SSA-623, SSA-6230 AND SSA-6234, REPRESENTATIVE PAYEE REPORT (FOR ADULT AND CHILD BENEFICIARIES AND FOR ORGANIZATIONAL REPRESENTATIVE PAYEES)

iRPA (INTERNET REPRESENTATIVE PAYEE REPORTING)

20 CFR 404.635, 404.2035, 404.2065, and 416.665

OMB No. 0960-0068

A. **Justification**

1. In certain cases, the Social Security Administration (SSA) determines that it is not in beneficiaries' best interest to receive their benefits payments directly. As per Section 1631(a) of the Social Security Act and sections 20 CFR 404.635, 404.2035, 404.2065, and 416.665 of the Code of Federal Regulations, in such cases SSA can designate a family member or other person or organization to act as the representative payee for beneficiaries. In this capacity, the person or organization receives the SSA beneficiary's payments directly and manages these payments.

As part of its stewardship mandate, SSA must ensure that representative payees are using the payments they receive for the beneficiary they represent. The Agency collects the information necessary to make this assessment through forms SSA-623, the Representative Payee Report (for Adult beneficiaries), SSA-6230, the Representative Payee Report (for Child beneficiaries), and SSA-6234, the Representative Payee Report (for Organizational Representative Payees).

In this ICR, SSA is making three revisions to this collection: 1) we are combining forms SSA-623, -6230, and -6234 under one OMB number (currently, form SSA-6234 is cleared under its own OMB number, 0960-0691); 2) we are creating an Internet version of these forms called the Internet Representative Payee Accounting, or iRPA; and 3) we are making some formatting changes to the instruction pages for the forms).

- 2. This ICR includes paper forms SSA-623, SSA-6230, SSA-6234 and the new electronic iRPA. We also created a one-page insert informing representative payees about the availability and benefits of iRPA that we will include with future mailings of the paper forms. SSA will use the information it collects from these modalities to determine if the various types of representative payees are using SSA benefits payments in the best interests of the beneficiaries they represent.
- 3. We developed an online electronic version of these forms called iRPA under the Agency's Government Paperwork Elimination Act plan. In the iRPA platform, representative payees

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- will only see those screens which apply to them. Representative payees will also be able to save and submit the completed application electronically.
- 4. The nature of the information we are collecting and the manner in which we are collecting it preclude duplication. SSA does not use any other collection instrument to gather similar data.
- 5. This collection does not significantly impact small businesses or other small entities.
- 6. If SSA did not conduct this information collection, the Agency would have no means of ensuring that representative payees were using the money they receive from SSA for the beneficiary's benefit. Since we only collect the information annually to reflect the past year's use of SSA payments, we cannot collect it less frequently.
 - There are no technical or legal obstacles that prevent burden reduction.
- 7. There are no special circumstances that would cause SSA to conduct this information collection in a manner inconsistent with 5 CFR 1320.5.
- 8. SSA published the Advance 60-day Federal Register Notice on April 28, 2008, at 73 FR 22989, and we did not receive any public comments. We published the 30-day Federal Register Notice on July 1, 2008, at 73 FR 37524. If SSA receives any public comments in response to the 30-day Notice, we will forward them to OMB.
 - SSA did not consult with the public about this form.
- 9. SSA provides no payment or gifts to the respondents (except for payments for the beneficiary).
- 10. SSA protects and holds confidential the information it requests in this ICR 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. Please see the next page for the projected annual burden for this ICR. SSA reported the total burden as burden hours, and we did not calculate a separate cost burden.

	Number of Respondents	Frequency of Response	Average Burden Per Response (minutes)	Estimated Annual Burden (hours)
SSA-623 (paper)	2,093,125	1	15	523,281
SSA-6230 (paper)	2,592,500	1	15	648,125
SSA-6234 (paper)	626,875	1	15	156,719
Internet Representative Payee Report*		1	15	234,374
Totals	6,250,000	-	-	1,562,500 (rounded)

*One Internet platform that is customized for users of all three paper forms

- 13. There is no known cost burden to the respondents.
- 14. The annual cost to the Federal Government is approximately \$29,500,000. This estimate is a projection of the costs for printing and distributing the collection instrument, for collecting the information, and for establishing and maintaining the iRPA Internet-based application.
- 15. The increase in burden is due to our folding in form SSA-6234 into this OMB number. Please note there was no actual burden reduction. There appeared to be one because of the way ROCIS had mistakenly combined two separate forms under one Information Collection.
- 16. SSA will not publish the results of this information collection.
- 17. OMB exempted SSA from the requirement to print the OMB approval expiration date on its program forms. SSA produces millions of public-use forms, many of which have a life cycle larger than that of an OMB approval. SSA does not periodically revise and reprint its public-use forms (e.g., on an annual basis). OMB granted this exemption so that SSA would not have to discontinue use of otherwise useable editions of forms because the expiration date had been reached. In addition, SSA avoids Government waste because we will not have to destroy and reprint existing stocks of forms.
- 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 SSA does not use statistical methods for this information collection.
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