

Supporting Statement for Form SSA-11-BK
Request to be Selected as Payee
20 CFR 404.2010-404.2055, 20 CFR 416.601-416.665
OMB No. 0960-0014

A. Justification

1. *Sections 205 (j) and 1631 (a) (2) of the Social Security Act* provide that payment of an individual's Old-Age, Survivors and Disability Insurance and Supplemental Security Income benefits may be certified to a relative or some other person (including an appropriate public or private agency) who is concerned with the welfare of such individual. These sections also require SSA to investigate before certifying payment to such a third party. *Sections 20 CFR 404.2010-404.2055 and 416.601-416.665 of the Code of Federal Regulations* set out procedures and policies for implementing the above sections of the statute. These sections require that the representative payee applicant shall submit such evidence as may be needed to establish relationship to, or responsibility for, the care of the beneficiary.
2. SSA requires the information collected by the Form SSA-11-BK as part of its investigation of a potential payee for a Social Security, Supplemental Security, or Special Veterans Benefits beneficiary. These investigations obtain information from a payee regarding the applicant's relationship to the beneficiary, personal qualifications, concern for the beneficiary's well-being and the use of benefits if appointed as payee. The respondents are individuals, private sector, and state and local governments.
3. SSA collects information electronically for approximately 66 percent of the respondents through the Representative Payee System (RPS) in an online environment. Although this is a convenient and efficient way to obtain the information, SSA's experience to date has been that the electronic method of collection takes as long as completing a paper copy.
4. The nature of the information collected and the manner in which it is collected preclude duplication. There is no other collection instrument used by SSA that collects data similar to that collected here.
5. Although the collection of information will involve some small businesses or other small entities (such as nursing homes), SSA has taken all possible steps to minimize the burden.
6. SSA collects this information when evidence shows that a beneficiary needs a representative payee to manage their benefits. SSA uses the information collected on the form to determine whether the payee applicant is qualified to fulfill the responsibilities of this role. The consequences of not collecting this information are

that SSA would select someone who might not manage the funds in the best interest of the beneficiary. Therefore, SSA could not collect the information 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 that is not consistent with 5 CFR 1320.5.
8. The 60-day advance Federal Register Notice published on September 17, 2008, at 73 FR 53919, and SSA received no public comments. The second Notice published on December 11, 2008, at 73 FR 75490. There have been no outside consultations with members of the public.
9. SSA provides no payment or gifts to the respondents.
10. The information requested 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. Form SSA-11-BK is used by approximately 1,500,000 respondents annually as shown by the charts below:

Individuals/Households (90%):

Collection Method	Number of Respondents	Frequency of Response	Average Burden Per Response	Total Annual Burden
Representative Payee System (RPS)	135,000	1	10.5	23,625
RPS/Signature Proxy*	765,000	1	9.5	121,125
Paper Version	450,000	1	10.5	78,750
Totals	1,350,000			223,500

Private Sector (9%):

Collection Method	Number of Respondents	Frequency of Response	Average Burden Per Response	Total Annual Burden
RPS	13,500	1	10.5	2,363
RPS/Signature Proxy*	76,500	1	9.5	12,113
Paper Version	45,000	1	10.5	7,875
Totals	135,000			22,351

State/Local/Tribal Government (1%):

Collection Method	Number of Respondents	Frequency of Response	Average Burden Per Response	Total Annual Burden
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			Response	Burden
RPS	1,500	1	10.5	263
RPS/Signature Proxy*	8,500	1	9.5	1,346
Paper Version	5,000	1	10.5	875
Totals	15,000			2,484

Grand Total:	1,500,000			248,335
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The total burden reflects as burden hours, and SSA has calculated no separate cost burden.

The Signature Proxy process removes the requirement for a “wet” signature on benefit applications and continues the agency’s progress to a totally electronic environment. For people applying for benefits by phone or in person, claims representatives ask them to verify that they are filing for benefits and understand the penalty for giving false information. The applicant’s response is added to the electronic claims record. Under the Signature Proxy process, a “signature” is obtained by giving verbal consent for telephone claims

13. There is no known cost burden to the respondents.
14. The estimated cost to the Federal Government is \$4,612,500. This estimate incorporates \$34,500 (500,000 paper forms) plus \$4,578,000 electronic responses. SSA bases the electronic response formula on a quantification of a Claims Representative salary (GS-11/5) multiplied by the number of minutes to prepare the form and multiplied by the number of electronic responses (.436 x 10.5 x 1,000,000).
15. There are no changes in the public reporting burden. Prior to ROCIS we were not able to show the various collection methods and respondent types individually. Therefore, we are now splitting them into individual ICs.

However, we are making changes to the collection instrument in order to remove the references to Black Lung and make minor changes for clarification and streamlining purposes (see Addendum).

16. SSA will not publish the results of the information collection.
17. OMB has granted SSA an exemption from the requirement to print the expiration date for OMB approval on its program forms. SSA produces millions of public-use forms, many of which have a life cycle longer 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 need to take otherwise useable editions of forms out of circulation because the expiration date had been reached. In addition, SSA avoids Government waste because the agency will not need to destroy and reprint 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.