

Supporting Statement for Form SSA-2001-F6
Representative Payee Report-Special Veterans Benefits
20 CFR 408.665
OMB No. 0960-0621

A. Justification

1. *Title VIII of the Social Security Act (the Act)* provides for payment of benefits to certain World War II veterans who reside outside the United States. *Section 807(a)* provides that if the Social Security Administration (SSA) determines that it is not in the best interest of the beneficiary to receive benefits directly, SSA may certify payments to a relative, another person or organization interested in, or concerned about, the welfare of the beneficiary. These individuals or organizations are called representative payees. *Section 807(h) of Title VIII* requires the Commissioner of Social Security to establish a system of accountability monitoring. *20 CFR 408.665 of the Code of Federal Regulations* requires that a representative payee must account for the use of a beneficiary's benefits.
2. SSA needs the information collected on Form SSA-2001-F6 to determine whether the representative payee has used the certified payments properly and continues to demonstrate strong concern for the beneficiary's best interests. Representative payees who receive special veterans benefits (SVB) on behalf of beneficiaries outside the United States must complete the SSA-2001-F6 annually. Completion of the form is also required any time SSA has reason to believe the representative payee could be misusing the payments.
3. SSA has no plans to implement an electronic version of this form due to the extremely low volume of usage.
4. The nature of the information SSA is collecting and the manner in which we are collecting it preclude duplication. SSA has no other collection instrument that collects data similar to that collected here.
5. This collection has no impact on small businesses or other small entities.
6. Collection of the information to determine continued suitability of the representative payee takes place annually. The regulatory requirement is a result of a class action suit filed against SSA; thus, if SSA did not collect the information, we would be in violation of the regulatory requirement. (The U.S. District Court for the Western District of Oklahoma ordered the Commissioner to obtain universal, mandatory accountings from all representative payees {Jordan vs. Heckler}). Therefore, we cannot collect the information less frequently.
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. SSA published the 60-day advance Federal Register Notice on March 19, 2009 at 74 FR 11804, and we have received no public comments. SSA published the second on June 9, 2009 at 74 FR 27379. 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. Approximately 100 respondents per year will use Form SSA-2001-F6. We estimate that the burden time is about 10 minutes per response. This results in a total of 17 burden hours. The total burden represents burden hours, and we did not calculate a separate cost burden.
13. There is no known cost burden to the respondents.
14. The annual cost to the Federal Government is approximately \$462. This estimate is a projection of the costs for printing and distributing the collection instrument and for collecting the information.
15. There are no changes in the annual reporting burden.
16. SSA will not publish the results of the information collection.
17. OMB exempted SSA from publishing the expiration date for OMB approval on its 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). OMB granted this exemption so that SSA would not have to stop using otherwise useable editions of forms with outdated expiration dates. In addition, we avoid government waste because we do not have 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 is not using statistical methods this information collection.