

# REGISTRATION OF INDIVIDUAL FOR APPOINTED REPRESENTATIVE SERVICES

OMB No. 0960-0732

## ADDENDUM TO THE SUPPORTING STATEMENT

### Background Information Regarding Changes

SSA is establishing both an Internet and paper registration process to enable representatives to receive a User ID and a Rep ID and perform business with SSA online. The online process will require the representative to go into SSA's secure website and use the Integrated Registration Services (IRES) process (IRES is cleared under OMB No. 0960-0626). When the initial authentication is complete, the user is passed to the appointed representative suite where the user can register as a representative. Initially, those who file online with us and go through the proper authorizations will be able to access certain electronic folders online. Those who choose to do business with SSA in paper will continue to receive CDs of their claimant's folders.

Initially, SSA will invite representatives to participate in the registration process and access their clients' electronic folder (Phase I). With Phase I, we will implement the revised Form SSA-1699, Registration of Individuals for Appointed Representative Services and supplements. Assuming a successful rollout by invitation, we plan to open access to the electronic folder to all those who register online and meet the requirements for access.

Next year, SSA plans to release Phase II of the Appointed Representative Suite. This includes the ability for firms to register. With the implementation of the Representation of Parties regulation in 2010, SSA will be able to recognize firms. Assuming the firm registered using the Appointed Representative Suite, the firm can be paid directly rather than SSA paying the individual of the firm.

### General Changes

**Change:** The title of form SSA-1699 is changing from the "Request for Appointed Representative's Direct Payment Information" to the "Registration of Individuals and Staff for Appointed Representative Services."

**Justification:** The form is expanding to include new data collection fields for any person interested in doing business with SSA as an appointed representative, as well as non-attorney staff and contractors working on behalf of appointed representatives. The form collects information that will allow identification and authentication of each person; professional information that will assist the sanctioning process; payment information for the individual appointed representative; information regarding an individual who works on behalf of entity and individual representatives; taxpayer information needed for issuing appropriate Forms 1099-MISC; and appropriate attestations.

**Change:** Page 1, top. We added blocks to indicate whether this is an initial registration or an update of a prior registration.

**Justification:** This will provide clarity and save time for SSA employees when entering the information provided on paper forms.

**General Information and Instructions, Purpose of Form, Explanation of terms for completing this form,** pages i and ii.

**Change:** SSA added language for clarification to pages i and ii under sections.

**Justification:** Added language for added clarification.

**Privacy Act Statement,** page iii

**Change:** We revised the Privacy Act language.

**Justification:** We made modifications to comply with legal requirements.

**Paperwork Reduction Act Statement,** page iii

**Change:** We modified this to reflect the increased completion time.

**Justification:** Due to the increase in information to be collected, the time requirement has increased by 10 minutes.

**Section I,** page 1.

**Change:** We added the following questions: date of birth, daytime telephone number, home fax number (optional), and home email address.

**Justification:** The date of birth is needed to assist in the authentication process (for online access). The telephone number, fax number, and email address questions are for contact purposes.

**Section II,** page 2

**Change:** Number 3. We request information for representatives other than attorneys and non-attorneys.

**Justification:** In the previous SSA-1699, we only asked for an indication as to whether the individual is an attorney or eligible for direct payment non-attorney (EDPNA), since we used the form to collect information related to payment of direct fees and issuing the appropriate Form 1099-MISC (IRS form). Since we will begin collecting information for any person interested in doing business as an appointed representative or on behalf of an appointed representative, we

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must also collect information for those not interested in direct payment. This includes non-attorneys not eligible for direct payment; staff of appointed representatives; and family, friends, clergy, etc.

**Section III**, page 3

**Change:** We will collect additional professional information from attorneys.

**Justification:** This additional information will assist verification of professional standing and in the sanctioning process.

**Section IV**, page 4

**Change:** SSA's Office of the General Counsel edited the language

**Justification:** OGC added clarity to the instructions.

**Change:** Number 1. We provide a question at the beginning of this section to ascertain if the individual is or will ever be appointed as an individual representative.

**Justification:** If individuals respond affirmatively to the above question, they must provide an address SSA can use for issuing notices.

**Section V**, page 5

**Change:** This is a new section that provides information for an individual who will work on behalf of an entity or firm. This section also includes required attestations for attorneys and EDPNAs performing advocacy services on behalf of entities.

**Justification:** The information collected in this section provides information needed to establish affiliation of individuals who will provide authorized services before SSA on behalf of entity or firm.

**Change:** Bottom of the page. Attestation language: Your Information When You Are Working for an Entity or Firm, includes language changes.

**Justification:** OGC made specific wording changes for legal reasons.

**Section VI**, page 6

This is a new section that provides information for an individual who will work on behalf of an individual appointed representative. The information includes the name and representative identification number of the appointed representative.

**Justification:** The information collected in this section provides information needed to establish affiliation of individuals who will provide authorized services before SSA on behalf of an individual appointed representative.

**Section VII**, page 7

**Change:** OGC modified the language. Appointed representative was changed to entity representative.

**Justification:** The language was clarified by OGC to state that the advocacy services performed are on behalf of an entity.

**Change:** This new section provides attestations for anyone who will ever sign an SSA-1696 (Appointment of Representative) as an individual representative or sign an SSA-1696 on behalf of an entity when SSA recognizes entity registration.

**Justification:** These attestations must be provided to allow the legal recognition of an individual or an individual on behalf of an entity as an appointed representative.

**Section VIII**, page 8

**Change:** This section provides general attestations for all registrants, including support staff.

**Justification:** These are the required general attestations necessary for SSA to legally recognize any registrant for representative services.

**Supplement**, pages 10-13

**Change:** Pages 10 – 13. The form will initially include supplement pages to capture payment and entity affiliation information.

**Justification:** This information is needed until upcoming changes obsolete these pages in 2010.

**Change:** These 2 supplements provide information that will allow SSA to make direct fee payments and send notices to attorneys and non-attorneys appointed as individual representatives who are/are not working for an entity/firm.

**Justification:** SSA must collect a single notice/payment address during Phase I. Until SSA's back-end systems change with Phase II, SSA can only retain one address for sending the payment and notice. The form now collects a single notice/payment payment address during phase 1 for both attorneys and non-attorneys who are/are not working for an entity/firm.

**Change:** Pages 10 and 12. The title of the supplemental forms have changed. The single supplement was titled, “ Direct Payment Information for Attorneys and EDPNAs affiliated with Entities” changed to "Information for Attorneys and Non-Attorneys who are not Working for an

Entity/Firm" and "Information for Attorneys and Non-Attorneys who are Working for an Entities/Firms."

**Justification:** The form is not limited to collecting Direct Payment information during Phase I. We are also collecting the notice address. Since EDPNAs are non-attorneys, we made the form read easier and refer to this group as non-attorneys. The collection of this single payment/notice address is critical during phase I as SSA's back-end systems will not be reprogrammed to collect multiple payment/notice addresses until phase II.