

**SUPPORTING STATEMENT FOR FORM SSA-1699
REGISTRATION OF INDIVIDUAL FOR APPOINTED REPRESENTATIVE
SERVICES**

OMB No. 0960-0732

A. Justification

1. If individuals want to become official representatives for beneficiaries of Social Security benefits, the Social Security Administration (SSA) needs to collect certain information from them to register/appoint them as representatives. SSA uses form SSA-1699, Registration of Individuals and Staff for Appointed Representative Services, for this purpose. Sections 206(a) and 1631(d) of the *Social Security Act* give SSA the authority to collect the information requested by Form SSA-1699.
2. SSA uses the information provided by this form to register the following people: Individuals appointed as representatives;
 - Individuals who will perform advocacy services on behalf of an appointed representative;
 - Individuals who will act on behalf of an appointed representative and want access to our electronic services;
 - Individuals who will serve as administrators for an entity appointed as a representative.

By registering these individuals, SSA 1) authenticates and authorizes them to do business with us, 2) allows them access to our records for the claimants they represent, 3) facilitates direct payment of authorized fees to appointed representatives, and 4) collects the information we will need to meet Internal Revenue Service requirements to issue specific IRS forms if we pay these representatives in excess of a specific amount (\$600).

In this information collection request, we are renewing the form and are seeking clearance for changes planned for the form in October 2009 (see Addendum for description of changes).

3. SSA maintains an Internet-based version of this form. The respondents (representatives of Social Security benefits recipients) can complete and submit the requisite screens to SSA online. We estimate that approximately 95% of the respondents use this electronic version.
4. The nature of the information we are collecting and the manner in which we are collecting it preclude duplication. SSA does not use another collection instrument to gather similar data.
5. This collection does not significantly affect small businesses or other small entities.
6. If we did not collect this information, SSA would have no means of authenticating representatives, allowing them direct access to beneficiary records, or facilitating direct payment

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of authorized fees to representatives. Since we only collect the information on an as-needed basis, we cannot conduct the information collection 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 24, 2009, at 74 FR 18782, and we did not receive any public comments. We published the 30-day Federal Register Notice on July 16, 2009 at 74 FR 34616. If we receive any public comments in response to the 30-day FRN, we will forward them to OMB.

SSA met with several representatives from the National Organization of Social Security Claimants' Representatives (NOSSCR) and National Association of Disability Representatives (NADR) (less than 9 for each form/set of screens) and received feedback on an earlier version of the draft revised form-1699 and the 1699 Internet screens. The representative community offered the following comments:

- Representatives were confused by the term “entity,” asking if this meant a law firm. Accordingly, we revised an early version of the form to say “entity/firm” throughout the document.
 - Representatives did not want to provide their personal information (DOB, home address) on form-1699. Once we explained this information is used to authenticate them with SSA, the representatives were comfortable with the questions. However, they wanted this clarified on the form. We added, “For your protection, we collect your home contact information to check against our records.” This statement is on page 1, Section I.
 - Representatives thought their staff would register as “Other”. We added language to page 2, number 2 that reads “Non-attorney/staff” to ensure that staff checks block number 2.
 - The representatives thought the form name did not clearly state that staff should also register using this form. We therefore renamed the form, “Registration of Individual and Staff for Appointed Representative Services.”
9. SSA provides no payment or gifts to the respondents (except for payment of authorized fees).
 10. SSA protects and holds confidential the information we are requesting 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. This information collection does not contain any sensitive questions.

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12. Below is a chart reflecting the estimated annual burden for this collection. The total burden represents burden hours, and we did not calculate a separate cost burden.

Modality of Completion	Number of Respondents	Frequency of Response	Average Burden Per Response (minutes)	Estimated Annual Burden (hours)
SSA-1699 (paper form)	52,800	1	30	26,400
Internet-based SSA-1699	13,200	1	22	4,840
Totals	66,000	-	-	31,240

13. There is no known cost burden to the respondents.
14. The annual cost to the Federal Government is approximately \$350,000. This estimate is a projection of the costs for printing and distributing the collection instrument and for maintaining and revising the Internet application.
15. This is a revised information collection that will increase the public reporting burden. The increase is due to our revising the form to ask additional questions (to accomplish more objectives than previously), resulting in greater completion time.
16. SSA will not publish the results of the information collection.
17. For the **paper version** of this form, OMB has exempted SSA from publishing the OMB approval expiration date 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 to avoid destroying otherwise useable editions of forms, avoiding Government waste.
- For the **electronic version** of this form, SSA is not requesting an exemption from displaying the OMB expiration date.
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.