

**SUPPORTING STATEMENT FOR FORM
SSA-8202-BK
STATEMENT FOR DETERMINING CONTINUING ELIGIBILITY FOR
SUPPLEMENTAL SECURITY INCOME PAYMENT
20 CFR 416.204
OMB No. 0960-0145**

A Justification

1. Introduction/Authoring Laws and Regulations

Title XVI, part A, section 1611(c)(1) of the Social Security Act requires that " . . . eligibility for and the amount of [supplemental security income (SSI)] benefits . . . shall be redetermined at such time or times as may be provided by the [Commissioner]." The Social Security Administration (SSA) regulation at 20 CFR 416.204 of the Code of Federal Regulations provides that we conduct redeterminations (RZs) periodically on a scheduled basis, or when we receive notification of a change, which would affect an SSI recipient's continued eligibility or payment amount.

2. Description of Collection

If an SSI record has many changes (i.e., changes of income, resources, living arrangements, etc.) there is a higher probability of error in paying the person correctly. When changes occur, but are not a high number it is a middle-error probability (MEP). When a low number of changes occur, and has a low probability of error, it is a low-error probability (LEP).

SSA uses Form SSA-8202-BK to conduct low- and middle-error-profile (LEP-MEP) telephone or face-to-face redetermination interviews with Supplemental Security Income (SSI) recipients and representative payees. SSA employees' documents the information gathered during the interview process through our Modernized SSI Claims System (MSSICS), and its paper equivalent Form SSA-8202-BK. The information collected during the interview is necessary to determine whether SSI recipients have met and continue to meet all statutory and regulatory requirements for SSI eligibility and whether they have been, and are still receiving, the correct payment amount.

3. Use of Information Technology to Collect the Information

We collect approximately 85% of the SSA-8202-BK interviews through our Modernized SSI Claims System (MSSICS) and the remaining 15% of interviews on the paper Form SSA-8202-BK. In addition, SSA conduct's electronic interfaces with records of other government entities to determine whether there are conflicts between the information we have on our system of records and other government entities; however, we must verify any conflicting information we get through these sources with the SSI recipient.

4. Why We Cannot Use Duplicate Information

Form SSA-8203-BK also collects information similar to that collected by Form SSA-8202-BK. Form SSA-8203-BK (OMB Number 0960-0416) is a more comprehensive, complex redetermination form used to conduct High Error Profile (HEP) redeterminations. It is not a self-help form and is always completed by SSA field office personnel conducting personal contact interviews with MISSICS.

Form SSA-8202-BK is a simpler design not intended for use in HEP redeterminations. Conducting low and middle-error profile (LEP/MEP) redeterminations using Form SSA-8203-BK instead of Form SSA-8202-BK creates an unnecessary burden on the recipients at a higher cost to the Federal government. Therefore, SSA does not use the two forms for the same purpose.

5. Minimizing Burden on Small Respondents

This collection does not affect small businesses or other small entities.

6. Consequence of Not Collecting Information or Collecting it Less Frequently

If we did not use form SSA-8202-BK, potential eligibility or events affecting payment may go undetected due to not performing RZs. This can adversely affect recipients through underpayments (i.e., erroneously low benefit payments) or overpayments (excessive benefits payments which will result in collection activities).

MEP redeterminations done annually and have proven to be cost effective. In addition, since SSA collects a majority of LEP on a 6-year cycle, we cannot collect it less frequently. Collecting these types of redeterminations less frequently would compromise program integrity.

There are no technical or legal obstacles to burden reduction.

7. Special Circumstances

There are no special circumstances that would cause SSA to conduct this information collection in a manner inconsistent with 5 CFR 1320.5.

8. Solicitation of Public Comment and Other Consultations with the Public

SSA published the 60-day advanced Federal Register Notice on December 28, 2009 at 74 FR 68655, and we received no public comments. The second Notice published on March 04, 2010 at 75 FR 9992. If we receive comments in response to the 30-day Notice, we will forward them to OMB. We did not consult with the public in the revision/maintenance of this form.

8. Payment or Gifts to Respondents

SSA does not provide payments or gifts to the respondents.

10. Assurances of Confidentiality

SSA protects and holds confidential the information it collects 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. Justification for Sensitive Questions

The information collection does not contain any questions of a sensitive nature.

12. Estimates of Public Reporting Burden

The below chart represents the estimated annual burden associated with this collection activity:

Forms	Number of Respondents	Frequency of Response	Average Burden per Response	Estimated Annual Burden Hours
SSA-8202-BK	235,390	1	21 Minutes	82,387
MSSICS	333,408	1	20 Minutes	111,136
TOTALS	568,798			193,523

This figure represents burden hours, and we did not calculate a separate cost burden.

Note: SSA published this information collection with the incorrect burden information on December 28, 2009 at 74 FR 68655.

13. Annual Cost to the Respondents (Other)

This collection does not impose a known cost burden to the respondents.

14. Annual Cost To Federal Government

The annual cost to the Federal Government is approximately \$10,780,000.00. This estimate is a projection of costs for printing, postage, envelopes, and SSA staff time.

15. Program Changes or Adjustments to the Information Collection Request

There has been a decrease in burden hours. The decrease in burden hours is because SSA profiled fewer RZS due to budget costs.

15. Plans for Publication Information Collection Results

SSA will not publish the results of the information collection.

16. Displaying the OMB Approval Expiration Date

OMB granted SSA an exemption from the requirement to print the OMB expiration date on its program forms. SSA produces millions of public-use forms with life cycles exceeding those of an OMB approval. Since SSA does not periodically revise and reprint its public-use forms (e.g., on an annual basis), OMB granted this

exemption so SSA would not have to destroy stocks of otherwise useable forms with expired OMB approval dates, avoiding Government waste.

17. Exceptions to Certification Statement

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. Collection of Information Employing Statistical Methods

SSA does not use statistical methods for this information collection.