

**REGISTRATION FOR APPOINTED REPRESENTATIVES AND DIRECT PAYMENT
FORM SSA-1699**

OMB No. 0960-0732

ADDENDUM TO THE SUPPORTING STATEMENT

REQUEST FOR EMERGENCY CLEARANCE

Background Information

In September 2009, SSA obtained OMB approval for a revised form SSA-1699 and accompanying new business process. SSA planned to expand the user population for the new SSA-1699 to include not only representatives, but also individuals who 1) perform advocacy services on behalf of appointed representatives, 2) act on behalf of appointed representatives and want access to SSA's electronic services, and 3) serve as administrators for an entity appointed as a representative.

Additionally, SSA envisioned creating one comprehensive suite of services for these groups, eliminating the need to complete more than one form and allowing respondents to accomplish multiple goals in one setting. Specifically, we planned to use the new SSA-1699 business process to 1) authenticate and authorize respondents to conduct business with us, 2) allow them access to our records for the claimants they represent, 3) facilitate direct payment of authorized fees to appointed representatives, and 4) collect the information we needed to meet Internal Revenue Service requirements to issue specific IRS forms if we paid these representatives in excess of a specific amount (\$600).

Several weeks after our October 2009 implementation date, SSA realized the scope of this new project was too ambitious. Multiple appointed representatives called the agency and expressed confusion with the system. They were uncertain which questions to answer, felt some questions were duplicative (they were not, but their unique purposes were unclear), were perplexed by the length of the new form/accompanying Internet system, and were unsure of some questions' intent. As a result, multiple representatives submitted new applications incorrectly or in incomplete form. This required SSA employees to call each representative and complete the application over the phone, imposing extra time burdens on both parties.

SSA realized continued use of this new business process would cause confusion and inconvenience for representatives, would prevent them from transacting business effectively with the agency, and would impose cost and time burdens on SSA. For these reasons, we are seeking immediate emergency clearance of a different business process.

Description of New Interim Business Process

We are seeking emergency clearance of a newly revised interim form SSA-1699 and accompanying business process. Appointed representatives will use this form to accomplish three goals: 1) to register for direct payment of fees, 2) to register for access to their claimants'

0960-0732 (SSA-1699) Addendum
2/3/2021

electronic SSA folders, and 3) to provide the minimum amount of information needed for addresses, attestations, and necessary sanctions. We tested this interim form with nine representatives, all of whom found it easy to understand and complete.

General Changes

Change: The title of form SSA-1699 is changing from the “Registration of Individuals and Staff for Appointed Representative Services” to the “Registration for Appointed Representative Services and Direct Payment.”

Justification: We are streamlining this into an interim process that removes or modifies data collection fields for any person interested in doing business with SSA as an appointed representative. In the interim process, the form will not collect data from staff of attorneys or non-attorneys 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 and notice information for the individual appointed representative; information regarding an individual who works for a firm or organization; taxpayer information needed for issuing appropriate Forms 1099-MISC; and appropriate attestations.

Purpose of Form, page i.

Change: We moved “Purpose of Form” to before “General Information and Instructions.” We provided bulleted descriptions for individuals required to complete the form. We provided a note of explanation for individuals who do not need to complete the form. We revised the language for information necessary to conform to Internal Revenue Code sections.

Justification: SSA moved and reordered language to streamline and clarify the page and to improve usability by registrants. Information for this page decreased with the removal of certain language.

General Information and Instructions, page i

Change: We removed instructions for registering online. We removed instructions to mail the form to a local Social Security office. We added language that instructs users to fax the form to the Office of Central Operations, and provides a fax number for this purpose.

Justification: We revised the instructions to follow the interim business process and provide clarified language to improve usability by registrants.

Explanation of terms for completing this form, page i

Change: We removed explanations for “Advocacy Services,” “On behalf of,” “Representational Services,” “User Identification Number, and “Entity.”

Justification: We removed these terms for the form, since their content no longer applies in this streamlined business process.

Paperwork Reduction Act Statement, page ii

Change: We modified this to reflect the decreased completion time.

Justification: Due to the decrease in information to be collected, the time requirement has decreased by 10 minutes.

Page 1, top

Change: We removed the top section including blocks to indicate whether this is an initial registration or an update of a prior registration. We moved the RepID box into a separate portion of Section I and included language for when an individual provides a Rep ID.

Justification: This will provide clarity to registrants and saves time for registrants and SSA employees when entering information for forms.

Section I, page 1.

Change: We removed language for initial registration from the form. We added language for an update of information. We included more detailed explanation and instructions for the section to add clarification for the interim process.

Justification: This will provide clarity to registrants and save time for SSA employees when entering the information on the form.

Change: We added the word “Your” to Name fields, Date of Birth, SSN, Home Mailing Address, Daytime Telephone Number, Home Fax Number, and Email Address. We also segmented the SSN to allow for entry without the use of hyphens.

Justification: Adding the word “Your” ensures registrants will enter information about themselves rather than client information. The segmenting of the SSN will discourage registrants from entering hyphens in the 9 digit field and omitting the last 2 digits of their SSN.

Section II, page 2.

Change: We removed information blocks for attorneys and non-attorneys and replaced the information with a question on good standing to practice law. We added responses that assist the user on the correct section to complete. We removed the option of “staff” and “other” as options to select. We provide a note to individuals who may be appointed as a representative for a relative, friend, or other acquaintance.

Justification: In the previous SSA-1699, we asked for an indication about whether the individual is an attorney or non-attorney. Asking for professional standing will provide clarity for the user and save time for SSA employees when entering the information provided on paper forms. The note gives guidance to individuals representing relatives, friends, or acquaintances

that they do not need to complete the form. Staff will not need to register during the interim process.

Section III, page 2

Change: We will not collect all professional information from attorneys; therefore, we removed the table of standings. We moved this section to page 2.

Justification: SSA's Office of the General Counsel concurs with collecting information for just one professional standing. This information is sufficient to assist in verification of professional standing and for the sanctioning process. This will also save time for representatives and SSA employees when entering the information provided on paper forms.

Section IV, page 3

Change: We removed bulleted instructions for this section. We added information from the supplement, "Registration for Attorneys and Non-attorneys Who Are Not Working for an Entity/Firm," that will allow SSA to make direct fee payments, send notices, and provide 1099-MISC to attorneys and non-attorneys appointed as individual representatives to this section. We reworded and added response blocks for eligibility for direct payment of fee question. We provide the user assistance with the next section to complete when respondents answer the question negatively.

Justification: SSA must collect a single notice/payment address during the Phase I interim process. Until SSA's back-end systems change, SSA can only retain one address for sending the payment and notice. The form now collects a single notice/payment address for both attorneys and non-attorneys who work are not working for a firm or organization. We streamlined this information to provide clarity and save time for representatives and SSA employees when entering the information provided on paper forms. When asked if eligible to receive direct payment, a negative response assists the user on the next section to complete. This will provide clarity and save time for users.

Section V, page 4

Change: We renamed this section to "Your Information When You Are Working for a Firm or Organization." We removed the word "entity" and replaced it with "organization." We removed the attestations for attorneys and EDPNAs performing advocacy services on behalf of entities. We removed the question on eligibility for direct payment of fees because all representatives answer this question in Section IV. We added blocks for the user to indicate use of contact information given in sections I and IV. We added information from the supplement, "Information for Attorneys and Non-attorneys Who Are Working for an Entity/Firm," that will allow SSA to make direct fee payments, send notices, and provide 1099-MISC to attorneys and non-attorneys appointed as individual representatives to this section.

Justification: The information in this section is provided by individuals who are employees of a firm or organization. SSA must collect a single notice/payment address during this interim process. Until SSA's back-end systems change, SSA can only retain one address for sending the

0960-0732 (SSA-1699) Addendum
2/3/2021

payment and notice. The form now collects a single notice/payment address for both attorneys and non-attorneys who are working for a firm or organization. We streamlined this information to provide clarity and save time for representatives and SSA employees when entering the information provided on paper forms.

Section VI, page 5

Change: We removed information in this section for when an individual works on behalf of an individual appointed representative. We collected information in this section to establish affiliation of individuals who will provide authorized services before SSA on behalf of an individual appointed representative. We moved the attestations and questions for anyone who will ever sign an SSA-1696 (Appointment of Representative) as an individual representative from Section VII, “Attestations for Representation” and renamed Section VI, “Attestations and Questions for Representation.”

Justification: We streamlined the interim process and excluded support staff in the interim registration process. Moving and renaming Section VII decreases the number of pages for the form.

Section VII, page 6

Change: We moved the general attestations and perjury statement for all registrants, excluding support staff from Section VIII to Section VII.

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. Moving Section VIII, “General Attestations” to Section VII decreases the number of pages for the form.

Section VIII

Change: We moved the general attestations for all registrants, excluding support staff and removed this page.

Justification: These are the required general attestations necessary for SSA to legally recognize any registrant for representative services. Moving Section VIII, “General Attestations” to Section VII decreases the number of pages for the form.

Supplements and intentional blank pages

Change: We deleted these supplements pages. We moved the supplement page information to Section IV (for all representatives) and Section V (for individual representatives who work as employees of firms or organizations) that will allow SSA to make direct fee payments, send notices, and provide 1099-MISC to attorneys and non-attorneys appointed as individual representatives. We removed the pages left blank intentionally.

Justification: SSA collects a single notice/payment address in Sections IV and V during the interim process. Until SSA's back-end systems change, SSA can only retain one address for

sending the payment and notice. The form collects a single notice/payment address for individuals who are/are not working for a firm or organization. We streamlined this information to provide clarity and save time for representatives and SSA employees when entering the information provided on paper forms. Removal of these pages decreases the number of pages for the form.