



February 3, 2010

Kevin W. Herms
Office of Information and Regulatory Affairs, OMB
Room 10235, New Executive Office Bldg.
725 17th St. NW
Washington, D.C. 20503

Dear Mr. Herms:

Pursuant to our January 26, 2010 discussion with OMB, SSA is requesting emergency clearance of the interim form SSA-1699, "Registration for Appointed Representative Services and Direct Payment (OMB No. 0960-0732)." Background information and our justification for requesting emergency clearance follow.

Background

For many years, SSA used form SSA-1699 to collect information from representatives of Social Security claimants. We used this information to facilitate direct payment of authorized fees to representatives and meet Internal Revenue Service requirements to issue an IRS Form 1099-MISC to representatives.

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).

Issues in Implementation/Need for Emergency Clearance

Before implementing this new business process, SSA consulted two professional organizations comprising many of the representatives who would use the new form and process. Both groups conveyed their members' enthusiasm for the project. Accordingly, we began using the new system in October 2009.

After several weeks, 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 need to seek immediate emergency clearance of a different business process.

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 these goals: 1) to register for direct payment of fees, 2) to register for access to their claimants' electronic SSA folders, 3) to provide the minimum amount of information needed for addresses, attestations, and necessary sanctions, and 4) to collect the information SSA will need to issue IRS forms if we pay representatives in excess of a specific amount (\$600). We tested this interim form with nine representatives, all of whom found it easy to understand and complete.

Once OMB approves this interim form, we can immediately make it available to representatives. This interim process will allow representatives to complete necessary transactions with SSA on behalf of the claimants they represent. While the interim form and business process are in use, SSA will work with the representative community to develop a business process that will fulfill some of our original goals for a multi-faceted system, but will be easier to use for representatives.

To enable quick rollout of this interim form, we are requesting OMB clearance one week from today, by **Wednesday, February 10, 2010**. Please contact SSA's Acting Reports Clearance Officer, Faye I. Lipsky, at 410-965-8783 or faye.lipsky@ssa.gov with any questions about this collection.

Sincerely,

Faye I. Lipsky
Acting Reports Clearance Officer
Social Security Administration