

## SUPPORTING STATEMENT FOR FORM SSA-1699

### REGISTRATION FOR APPOINTED REPRESENTATIVE SERVICES AND DIRECT PAYMENT

OMB No. 0960-0732

#### REQUEST FOR EMERGENCY CLEARANCE

##### A. Justification

1. If individuals want to become official representatives for Social Security claimants, the Social Security Administration (SSA) needs to collect certain information from them to register/appoint them as representatives. SSA uses form SSA-1699, Registration for Appointed Representative Services and Direct Payment, 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. In October 2009, SSA began using a newly revised version of form SSA-1699. However, due to user confusion, SSA realized we could not continue using this new version (see “Emergency Clearance Letter” for details). Accordingly, we developed a revised interim SSA-1699, and we are now seeking emergency clearance for this revised interim version.

For this interim form SSA-1699, SSA will collect information from appointed representatives of Social Security claimants who 1) want to register for direct payment of fees; 2) registered for direct payment of fees prior to 10/31/09, but need to update their information; 3) registered as appointed representatives on or after 10/31/09, but need to update their information; and 4) received a notice from SSA instructing them to complete this form. 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 (IRS) requirements to issue specific IRS forms if we pay these representatives in excess of a specific amount (\$600).

See Addendum to the Supporting Statement, attached to this ICR as a separate document, for a detailed description of the changes we made to create the new interim SSA-1699. Note that while this interim form is in use, SSA will be working on creating a new business process and form that will incorporate some of the goals from our October 2009 form but will be easier for representatives to use.

3. Because this is an interim form which we plan to disseminate as soon as OMB grants emergency clearance, we did not have time to create an Internet system for it under the agency’s Government Paperwork Elimination Act plan. However, when we seek clearance for a new, permanent business process, we will create an accompanying electronic version.

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

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, facilitating direct payment of authorized fees to representatives, or issuing the necessary IRS forms. Since we will 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 an emergency clearance Federal Register Notice on February 3, 2010, at 75 FR 5636. If we receive any public comments at the close of the one-week public comment period (February 10, 2010), we will forward them to OMB.

SSA discussed the revised interim Form SSA-1699 with nine members of the appointed representative community. These representatives told SSA the interim form SSA-1699 was significantly easier to understand and complete than the October 2009 version, and they were able to complete it in less time. They recommended we make this interim version widely available to the representative community at large as soon as possible.

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.
12. We estimate approximately 52,800 respondents will take 20 minutes each to complete this form, for a total of 17,600 hours. This figure represents burden hours, and we did not calculate a separate cost burden.
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 posting a PDF of the form on our Internet site.

15. Since we eliminated questions from the October 2009 version, this interim form is a revised information collection that decreases the public reporting burden.
16. SSA will not publish the results of the information collection.
17. 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.
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.