

Supporting Statement for SSI Monthly Wage Reporting (Telephone)
20 CFR 416.701-732
OMB No. 0960-0715

A. Justification

1. Introduction/Authoring Laws and Regulations

Section 205(a) of the *Social Security Act* for title II and *Section 1631(d) (1)* of the *Act* for title XVI authorizes the Commissioner to conduct a quality review process. *Section 20 CFR 416.701-732* require that beneficiaries of Supplemental Security Income (SSI) report changes, such as changes in income, resources and living arrangements that could affect the receipt and amount of their payments.

Section 202 of the *Social Security Protection Act* (42 USC 902 note) requires SSA to issue receipts to disabled beneficiaries, or their representatives, when they report wages.

SSI stewardship payment accuracy findings point to wages as first or second largest category of SSI overpayments year after year. Approximately 25 percent of all overpayment deficiency dollars (approximately \$400 million per year) are attributable to wages. Stewardship data indicate that the greater portion of these overpayment dollars is the result of fluctuating income and/or beneficiary failure to timely report an increase in wages. The amount of wages an SSI beneficiary or deemor (i.e., ineligible spouse or parent) receives can affect the beneficiary's payment amount or eligibility status.

We believe that we can prevent many of these overpayments by large-scale monthly wage reporting involving tens of thousands of SSI beneficiaries and deemors, if we can do it in a quick and accurate manner. However, SSA does not have the operational work-years to handle large-scale monthly wage reporting in either field offices (FOs) or teleservice centers. The SSI Monthly Wage Reporting (Telephone) is now the SSI Telephone Wage Reporting (SSITWR), which is an automated monthly wage reporting process that allows callers to phone a toll-free telephone number to report their wages. The respondents are SSI beneficiaries, deemors¹ and representative payees² of beneficiaries.

¹ Note: Deemors are parents of minor children and spouses of adult beneficiaries whose earned income is deemed to belong to the beneficiary and, therefore, reduces the amount of SSI payment.

² Note: A representative payee is the person, agency, organization, or institution selected to receive and manage benefits on behalf of an incapable beneficiary. This includes a parent who is receiving benefits on behalf of a minor child.

2. **Description of Collection**

Currently, field offices recruit SSI recipients who need to report gross monthly wage amounts that a wage earner were paid in the previous month. The recipients call a designated SSA toll-free telephone number from the first through the sixth day of each month using knowledge-based authentication. The purpose of this collection is to improve payment accuracy. The systems cutoff dates dictates the 6-day reporting period, and permits the alleged wage amounts to post to the SSITWR in time to prevent potential overpayments.

SSITWR fully automates monthly wage reporting by allowing the respondents to voluntarily report monthly wages by telephone instead of by contacting their local FO. Callers must provide their first and last name, social security number, and date of birth. We compare the authentication information that the caller provides to SSA records to determine the accuracy of the response. The system permits callers to make the wage report either by speaking their responses (through voice recognition technology), or by keying their responses using the telephone key pad. The automated system collects the information and sends it to SSA over secure channels.

SSA intends to continue expansion and usage of the SSITWR system. SSA will recruit participants during the course of normal contact with SSA, during an initial claim, pre-effectuation review contact (PERC), redetermination, or other post-eligibility contact. Once SSA determines a recipient can participate in SSITWR, the individual receives a training package and instructions regarding how to use the phone system. Reporting wages via the SSITWR system is voluntary on the part of the recipient, deemor, or representative payee.

3. **Use of Information Technology to Collect the Information**

The SSITWR system collects and transmits data electronically using telephone keypad entry and voice recognition technology. Beneficiaries, deemors and representative payees reporting monthly wages call an SSA toll-free telephone number that allows them to either speak their responses (voice recognition technology), or key in the information using the numeric identifiers on the telephone.

SSA decided to use this data gathering technology because it is widely available to SSI beneficiaries and deemors, whereas, for example, readily available access to the Internet among this population is inadequate to make its use cost effective at this time.

This automated information collection is in accordance with the agency's Government Paperwork Elimination Act plan.

4. **Why We Cannot Use Duplicate Information**

Form SSA-8150-EV (OMB. No. 0960-0128) is a one-page reporting form that collects some of the same information as that included in this IC. The form serves as

a reminder to individuals of the events they need to report and explains why reporting these events is important. We collect the information only once, either by telephone, or on the SSA-8150. Individuals use this form to report changes in writing. We authenticate respondents through telephone speech technology authentication through OMB No. 0960-0596.

SSA also collects information from other sources such as public and private institutions, employers, and via computer matches with Federal and State agencies. However, to pay correct SSI benefits in a timely manner and to prevent potential overpayments, SSA depends primarily on individuals, deemors and their representative payees to report changes in circumstances when they occur.

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 collect this information, or collect it in a timely fashion, improper wages would continue to be a leading cause of improper payments in the SSI program. 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**

The 60-day advance Federal Register Notice published on March 04, 2010, at 75 FR 9992, and we received no public comments. SSA published the second Notice on, May 13, 2010 at 75 FR 27036. If we receive comments in response to the 30-day Notice, we will forward them to OMB. We did not consult with the public on the maintenance of this form.

9. **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

Collection Method	Frequency of Reporting	Number of Respondents	Estimated Completion time	Burden Hours
Training/ Instruction ³	1	85,000	35 minutes	49,583
SSITWR	12	85,000	5 minutes	85,000
Total		85,000		134,583

The total burden for this ICR is 134,584 hours. This figure represents burden hours, and we did not calculate a separate cost burden.

Note: The first Federal Register Notice shows incorrect burden information for the SSITWR. We have corrected for this in the second Notice, in #12 and on ROCIS.

13. Annual Cost to the Respondents (Other)

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

14. Annual Cost To Federal Government

The annual cost to the Federal Government is approximately \$401,203. This estimate is a projection of the costs for collecting the information.

15. Program Changes or Adjustments to the Information Collection Request

There has been an increase in burden hours. The increase is because the number of respondents using the system has increased.

16. Plans for Publication Information Collection Results

SSA will not publish the results of the information collection.

17. Displaying the OMB Expiration Date

SSA is not requesting an exception to the requirement to display the OMB expiration date

18. Exception 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).

³ We are including the estimated time that it may take the participant to complete the training. Because we must separate the training package IC from the SSITWR, ROCIS makes it seem the number of respondents is 170,000. However, there are only 85,000 total respondents.

B. Collection of Information Employing Statistical Methods

SSA does not use statistical methods for this information collection.