

SUPPORTING STATEMENT FOR FORM SSA-322
BENEFICIARY INTERVIEW AND AUDITOR'S OBSERVATIONS
OMB No. 0960-0630

A. Justification

1. Introduction/Authoring Laws and Regulations

The Social Security Administration's (SSA) Office of the Inspector General (OIG) needs to collect information from Supplemental Security Income (SSI) recipients and Old-Age, Survivors and Disability Insurance recipients that have a representative payee.

The information on form SSA-322, Beneficiary Interview and Auditor's Observations is necessary to augment other data for the purpose of determining whether representative payees are complying with their duties.

As per *Sections 205 (j) (3) (A) and 1631 (a) (2) (C) (i)* of the *Social Security Act*. The OIG's authority to collect the information is in the *Inspector General Act of 1978*, as amended, (Public Law No. 95-452, 5 U.S.C. App. 3).

2. Description of Collection

SSA's (OIG) will use the information Form SSA-322 collects, the Beneficiary Interview and Auditor's Observation form, to interview SSI recipients to determine if the representative payees are complying with their duties and responsibilities. We randomly select recipients to interview and we interview about 10 to 20 recipients for each payee we review (10 payees x 20 recipients= 200 respondents).

OIG randomly selects the representative payee, or the SSA's Regional Office requests an audit, due to an apparent or potential misuse of the recipient's funds. When we select the representative payee, we contact them by phone to set up a time and date to interview the recipient (interviewee). The OIG staff conducts oral interviews to obtain this information. We will ask the same questions for each interviewee, and complete Form SSA-322 to document the answers. The respondents are SSI recipients who have representative payees.

3. Use of Information Technology to Collect the Information

SSA did not create an electronic version of form SSA-322 under the agency's Government Paperwork Elimination Act (GPEA) plan because only 200 respondents complete the form. This is less than the GPEA cut-off of 50,000.

4. Why We Cannot Use Duplicate Information

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 obtain similar data.

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-322, we would have no means to confirm that representative payees are complying with their duties and responsibilities. Because we collect the information once, we cannot collect it less frequently. There are no technical or legal obstacles to prevent 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 January 22, 2010, at 75 FR 3778. SSA published the second Notice on March 30, 2010, at 75 FR 15761. 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 revision 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

Approximately 200 respondents take 15 minutes to complete form SSA-322 each year. Accordingly, the burden is 50 hours. This figure represents burden hours, and we did not calculate a separate cost burden.

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 \$4,279. This estimate is a projection of the costs for printing and collecting the information.

15. Program Changes or Adjustments to the Information Collection Request

There are no changes to the public reporting burden.

16. Plans for Publication Information Collection Results

SSA will not publish the results of the information collection.

17. 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.

18. Exceptions to Certification Statement

SSA is not requesting an exception to the certification requirement 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.