

Supporting Statement for Form SSA-624
Representative Payee Evaluation Report
20 CFR 404.2065 and 416.665
OMB No. 0960-0069

A. Justification

1. **Introduction/Authoring Laws and Regulations** - *Sections 205(j) and 1631(a) (2) of the Social Security Act (Act)* state that SSA may certify benefits to a relative, another person or an organization interested in or concerned about the welfare of the beneficiary, when the Social Security Administration (SSA) determines it is not in a beneficiary's best interest to receive benefits directly. SSA calls these individuals and organizations representative payees. *Sections 205(j) (3) and 1631(a) (2) (C) of the Act* authorize SSA to monitor and verify (in certain situations) how the representative payees use payments. Representative payees (except State mental institutions participating in SSA's triennial onsite review program) are required to report to SSA in writing at least once a year to explain how they used and conserved the funds they received. *Section 20 CFR 404.2065 and 416.665 of the Code of Federal Regulations* authorizes SSA to collect periodic written reports from representative payees. SSA uses the Representative Payee Evaluation Report, Form SSA-624, as a documentation tool for interviews with and evaluations of representative payees. Respondents are individuals and organizations serving as representative payees who fail to comply with SSA's statutory annual reporting requirement for representative payees of Social Security beneficiaries or Supplement Security Income (SSI) recipients.

2. **Description of the Collection** - SSA field offices (FO) are required to conduct a face-to-face interview with the representative payee using Form SSA-624 when:

(1) SSA finds the payee's responses on SSA-required annual accounting reports (forms SSA-623/6230/6234 {OMB No. 0960-0068}) are unacceptable and cannot be resolved;

(2) the payee fails to complete the initial and second request for an annual accounting report; and,

(3) assessing the representative payee's continued suitability.

In addition to the representative payee, the beneficiary and custodian (if other than the payee) are also interviewed (face-to-face not required) to confirm information provided by the payee and to ensure the Social Security beneficiary or SSI recipient's current needs are being met.

3. **Use of Information Technology to Collect the Information** - FOs complete the paper form SSA-624 based on a face-to-face interview with the representative payee. The form is not available to representative payees. SSA FO representatives must fill out the form. Therefore, SSA has not scheduled this

form for electronic implementation under the SSA Government Paperwork Elimination Act plan.

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 may affect some small businesses or other small entities. We minimized the burden by carefully reviewing the form and ensuring that we ask small businesses/entities only relevant and necessary questions. We have also minimized the burden by incorporating Yes and No responses where feasible.
6. **Consequence of Not collecting Information or Collecting it Less Frequently** - SSA collects accounting information annually from representative payees. This statutory requirement is the result of a class action suit filed against SSA (Jordan v. Bowen), and therefore, the information must be collected. There is continued Congressional interest on initiatives designed by SSA to improve the representative payment monitoring process. For these reasons, we cannot collect the information less frequently. 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**- SSA published the 60-day advance Federal Register Notice on May 13, 2010 at 75 FR 27036, and we received no public comments. We published the 30-day Federal Register Notice on August 2, 2010 at 75 FR 45190. If we receive any comments in response to the 30-day Notice, we will forward them to OMB. SSA has had no outside consultations with members of the public.
9. **Special Circumstances** - 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** - FO's use Form SSA-624 annually for approximately 266,000 respondents. The estimated completion time is 30

minutes for a total burden of 133,000 hours. Based on SSA’s most recent data, we estimate the burden data as follows:

Type of Respondents	Number of Respondents	Frequency of Response	Response Time (minutes)	Burden (hours)
Individuals	192,920	1	30 minutes	96,460
State/Local Governments	8,410	1	30 minutes	4,205
Businesses	64,670	1	30 minutes	32,335
Total	266,000			133,000

The total burden reflects burden hours, and we did not calculate a separate cost burden.

13. **Annual Cost to the Respondents** - This collection does not impose a known cost burden to the respondents.
14. **Annual Cost to the Federal Government** - The annual cost to the Federal Government is approximately \$ 1,747,620. This estimate is a projection for collecting and processing the information.
15. **Program Changes or Adjustments to the Information Collection Request** - The reporting burden has changed due to an increase in the number of respondents.
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. **Exemption 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).

B. Collections of Information Employing Statistical Methods

SSA does not use statistical methods for this information collection.

