

Justification for the Non-Substantive Changes to Forms:

**SSA-2930-BK, RSI/DI Quality Review
Case Analysis-Sampled Number Holder;
SSA-2931-BK, RSI/DI Quality Review
Case Analysis-Auxiliaries/Survivors;
SSA-2932-BK, RSI/DI Quality Review
Case Analysis-Parent; and
SSA-4659-BK, RSI/DI Quality Review
Case Analysis-Stewardship AET Workbook
OMB No. 0960-0189**

Justification for the Non-Substantive Changes:

SSA intends to conduct two reviews during FY 2010 and FY 2011: 1) the Work CDR Review and 2) the Transaction Accuracy Review. For these reviews, we will use the Stewardship Quality Review forms and notices and will make modifications to some of the forms as noted below. For the Work CDR Review we will also use the SSA-8510 (OMB Control No. 0960-0707); however, we will not modify the SSA-8510 in any way during the review.

I. Work CDR Review:

Errors relating to Substantial Gainful Activity (SGA) accounted for approximately 48% of all Title II overpayment dollars for FY 2004 through FY2008. These errors amounted to approximately \$4.8 billion dollars in improper payments for the same period. The majority of these improper payments were due to SGA work activity during the post-entitlement period. The Office of Quality Performance (OQP) conducted a probe to examine the existing process for alerting and developing work activity by Title II disability beneficiaries.

Our probe indicates there are problems in the existing process on both the timely notification of work to the agency and the timely and complete development of the work activity. In the cases we reviewed, we noted that SSA did not usually receive the report of work within a timeframe that would have prevented any improper payments; SSA did not pursue development of the work in a timely fashion; and SSA's documentation of the work was often incomplete or absent.

To obtain more comprehensive data on these problems, OQP will conduct a 1,000 annual case Work CDR Review beginning October 2010 during which we will select 85 cases monthly. Where the electronic folder documentation is incomplete or conflicting, OQP will re-contact the beneficiary to resolve the issue.

We may need to modify our burden estimate for the SSA-L8553-U3 by an increase of 800 respondents; however, the current burden estimates for the rest of the Stewardship forms and notices should be more than adequate to cover the Work CDR contacts for this

review. Our sample is 1,000 cases, but we estimate we will only need to make contact with 800 respondents.

We will also use the SSA-8510 (OMB Control No. 0960-0707) as part of this review. However, we will not make any modifications to the form or adjust the current burden of 5,000 respondents.

The following chart shows the breakdown of expected burden for this review; however, the current OMB approval of the forms and notices cover all but the change in burden to the SSA-L8553:

Form Number	Annual Responses	Frequency	Burden Hours Per Response (minutes)	Total Annual Burden Hours
SSA-L8553-U3	800	1	5	67
SSA-L8554-U3	25	1	5	2
SSA-85	400	1	5	33
SSA-8510	800	1	5	67
SSA-820/821	400	1	15	100

II. Transaction Accuracy Review for FY 2011:

There are five notices currently used in our Stewardship Review that SSA will use for the Transaction Accuracy Review (TAR) FY 2011 review. The notices are: 1) **SSA-L8550-U3**, Visit Appointment Letter, used for in-person visits with the primary number holder; 2) **SSA-L8551-U3**, Visit Auxiliary Appointment Letter, used for an in-person visit with any beneficiary on the case that is not the primary number holder; 3) **SSA-L8552-U3**, Payee Visit Appointment Letter, used for in-person visits with the representative payee of a beneficiary; 4) **SSA-L8553-U3**, Phone Appointment Letter, used for a phone interview with the number holder as well as any party associated with the case; and 5) **SSA-L8554-U3**, Payee Phone Appointment Letter, used for a phone interview with the representative payee of a beneficiary. We expect to begin using the notices as soon as possible; however, they will require just a few modifications before we can use them for TAR. We are making the same revisions to all five letters, as highlighted on the enclosed revised notices. Below are the proposed changes to the notices:

- We are revising the introductory paragraph to make it more suitable for the TAR and to clarify the language. Stewardship is conducted monthly, but TAR is weekly:

o **Current language:**

▪ Either

- Every month the Social Security Administration asks a few people who get benefit checks to help us make sure that we pay everyone the right amount of money. This month, we picked your name by chance, **NOT** because we have any special question about you.

▪ Or

- Every month the Social Security Administration asks a few people who get benefit checks to help us make sure that we pay everyone the right amount of money. This month, we picked _____ (for whom you are representative payee) by chance, **NOT** because of any other reason

o **TAR Revision**

▪ Either

- The Social Security Administration asks a few people who get benefit checks to help us make sure that we pay everyone the right amount of money. We picked your name for this review. This account was chosen by chance, **NOT** because we have any special questions.

▪ Or

- The Social Security Administration asks a few people who get benefit checks to help us make sure that we pay everyone the right amount of money. We picked _____ (for whom you are representative payee), for this review. This account was chosen entirely by chance, **NOT** because we have any special questions.

- In addition, we are deleting the following paragraph and replacing it with a similar paragraph that is included on the SSA-85. The SSA-85 is included in all Stewardship and TAR notices. We send an earnings record for all Stewardship reviews but only on some of the TAR reviews. Therefore, we will include the earnings record review, if needed, on the SSA-85 enclosure:

o **Current language (dependent on the type of letter)**

▪ Either

- Also, enclosed with this letter is a copy of the earnings record for the account on which you are receiving benefits.

Please review the earnings and compare them with your records. I will discuss this with you [when I call; when I visit].

- Or

- Also, enclosed with this letter is a copy of the earnings record for the account on which _____ is receiving benefits. Please review the earnings and compare them with _____'s records. I will discuss this with you [when I call; when I visit].

- o **TAR Revision to the SSA-85 attachment**

- Either

- A copy of the earnings record for the account on which you are receiving benefits is enclosed. Please review the earnings and compare them with your records. I have highlighted some specific years that I would like to discuss with you.

- Or

- A copy of the earnings record for the account on which _____ is receiving benefits is enclosed. Please review the earnings and compare them with your records. I have highlighted some specific years that I would like to discuss with you.

- Since we may or may not need an earnings record review for the TAR review, we are removing the Earnings Record page, and including the earnings record language and disagreement statement on the SSA-85 attachment. TAR will not need this page because SSA does not send out the Earnings Record on every review case. Therefore, we are changing the following language:

- o **Current Language (on the Earnings Record, dependent on type of letter)**

Benefits are computed by giving credit for any earnings, since 1937, that were covered under the Social Security Act. As part of our review, we check the record for accuracy.

The earnings record shows yearly amounts for 1951 through recent years. In the years not shown, no earnings were reported to Social Security. Earnings during 1937 -- 1950 are shown as a separate total.

Please compare the earnings amounts to any records you have. Pay particular attention to:

- Years with no earnings
- Years with earnings much higher than the ones before and after them
- Years with earnings much lower than the ones before and after them

If you disagree with any of these earnings, please have your records available at the time of the interview. W2 forms are the best evidence of wages. Tax returns and proof of filing are the best evidence of self-employment earnings.

o **TAR Revision (on the SSA-85)**

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