

**Supporting Statement for  
RSI/DI Quality Review Case Analysis - Sampled Number Holder; Auxiliaries/Survivors; Parent;  
Stewardship Annual Earnings Test  
OMB: 0960-0189**

**A. Justification**

**1. Introduction/Authorizing Laws and Regulations**

*Section 205(a) of the Social Security Act (the Act)* authorizes the Commissioner of the Social Security Administration (SSA) to conduct the quality review process, which entails collecting information related to the accuracy of payments made under the Old-Age, Survivors, and Disability Insurance Program (OASDI). *Sections 228(a)(3), 1614(a)(1)(B), and 1836(2) of the Act* require a determination of the citizenship/alien status of the beneficiary; this is only one item that we might question as part of the Annual Quality review.

**2. Description of Collection**

SSA uses the forms in this collection to investigate the accuracy of payments for multiple programs. See below for a list of these forms and the issues they investigate:

- 1) SSA-2930 (RSI/DI Quality Review Case Analysis–Sampled Number Holder), SSA-2931 (RSI/DI Quality Review Case Analysis-Auxiliaries/Survivors), and SSA-2932 (RSI/DI Quality Review Case Analysis-Parent) establishes a national payment accuracy rate for all cases in payment status, and serves as a source of information regarding problem areas in the OASDI programs. SSA also uses the information to measure the accuracy rate for newly adjudicated OASDI cases.
- 2) SSA-4659 (Stewardship Annual Earnings Test Workbook) evaluates and determines the effectiveness of the annual earnings test and uses the results in developing ongoing improvements in the process. SSA sends each beneficiary an appointment letter for the interview.
- 3) SSA-820(Work Activity Report -Self-Employed Person), and SSA-821 (Work Activity Report- Employee) to determine if the recipient continues to meet the disability requirement of the law
- 4) SSA-8510 (Authorization for the Social Security Administration to Obtain Personal Information) authorizes SSA to contact third parties to confirm information reported on form OMB No. 0960-0696.
- 5) SSA-820-F4 secures information Social Security disability applicant’s self-employment activities.
- 6) SSA-821-BK determines whether recipients’ worked in employment after becoming disabled and, if so, whether the work is a substantial gainful activity. SSA will review and evaluate the data to determine if the recipient continues to

meet the disability requirement of the law

- 7) iClaim Stewardship questions are additional questions as part of the review to verify if the beneficiary is really the person who filed the iClaim.

About 25 percent of respondents will have face-to-face contact reviews and receive one of the following letters for an appointment: SSA-L8550-U3 (Appointment Letter-Sample Individual), SSA-L8551-U3 (Appointment Letter- Sample Family), or the SSA-L8552-U3 (Appointment Letter-Rep Payee). The other 75 percent of respondents will receive a notice for a telephone contact review: either the SSA-L8553-U3 (Beneficiary Telephone Contact), or the SSA-L8554-U3 (Rep Payee Telephone Contact) notice.

To help the beneficiary prepare for the interview, we include three forms with each notice:

- 1) SSA-85 (Information Needed to Review Your Social Security Claim) that lists the information the respondents will need to gather to prepare for the interview.

- 2) SSA-2935 (Authorization to the Social Security Administration to Obtain Personal Information) so SSA can obtain information to verify the correctness of the payment to the beneficiary.

- 3) SSA-8552 (Interview Confirmation) to confirm or reschedule the interview if necessary. The respondents are a statistically valid sample of all OASDI beneficiaries in current pay status or their representative payees.

The respondents are a statistically valid sample of all OASDI beneficiaries in current pay status or their representative payees.

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

While these forms are available as PDF versions on the SSA website, beneficiaries never fill out the forms directly. All of the information on these forms is collected through interviews with the beneficiaries. SSA conducts an estimated 75% of these interviews over the telephone and 25% face-to-face in a field office. The SSA employee conducting the interview writes down the answers to the questions directly on the paper form, for both telephone and in-person interviews.

SSA did not create an electronic version of these forms under the agency's Government Paperwork Elimination Act (GPEA) plan because only 18,424 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 the forms, SSA would be unable to effectively evaluate and recommend ongoing improvements for the OASDI program. In addition, insufficient coverage would result, data on the effects of policy and program changes would be lost, and users of this data (including Congress, SSA, other Federal agencies, the media, and the general public) would have to plan without firm knowledge of program characteristics. Because we only collect the information pm am as-needed basis, we cannot collect it 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**

The 60-day advance Federal Register Notice published on December 22, 2010, at 75 FR 80563, and SSA has received no public comments. The 30-day Notice published on March 16, 2011 at 76 FR 14441. If we receive any comments in response to this notice, we will forward them to OMB.

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**

<b>Form Number</b>	<b>Number of responses</b>	<b>Frequency of response</b>	<b>Average burden per response (minutes)</b>	<b>Total Annual Burden Hours</b>
SSA-2930	1,500	1	30	750
SSA-2931	750	1	30	375
SSA-2932	100	1	20	33
SSA-4659	325	1	10	54

SSA-L8550-U3	385	1	5	32
SSA-L8551-U3	95	1	5	8
SSA-L8552-U3	35	1	5	3
SSA-L8553-U3	4490	1	5	374
SSA-L8554-U3	670	1	5	56
SSA-8552	2350	1	5	196
SSA-85	3850	1	5	320
SSA-2935	2350	1	5	196
SSA-820/821(also saved under OMB: 0960-0598 and 0960-0059	400	1	15	100
SSA-8510 (also saved under OMB No. 0960-0707)	800	1	5	67
iClaim Stewardship Questions	324	1	10	54
<b>Totals</b>	<b>18,424</b>			<b>2,619</b>

The total burden for this ICR is 2,619 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 on the respondents.

14. **Annual Cost To Federal Government**

The annual cost to the Federal Government is approximately \$3,317. This estimate is a projection of the costs for printing and distributing the collection instrument and for collecting the information.

15. **Program Changes or Adjustments to the Information Collection Request**

There is an increase in burden for this ICR, because we have begun using other forms as part of our quality reviews. Although these we clear these forms under separate OMB numbers, the burden we report here is only for their use in this ICR. The burden chart in

question #12 indicates these forms and their OMB numbers.

16. **Plans for Publication Information Collection Results**

Results of the information collection are prepared in the Office of Assistance and Insurance Program Quality (OAIPQ) and published by the Office of Quality Assurance and Performance Assessment (OQA).

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 requirements at 5 CFR 1320.9 and related provisions at 5 CFR 1320.8(b)(3).