

**Addendum to the Supporting Statement for SSA-632-BK
Request for Waiver of Overpayment
Recovery or Change in Repayment Notice
20 CFR 404.502-404.513, 404.515 and 20 CFR 416.550-416.570, 416.572
OMB No. 0960-0037 (Renewal)**

Terms of Clearance:

In response to the Terms of Clearance OMB placed on this collection in 2007:

This ICR is approved for 18 months only because the explanation for not providing an electronic version of the form is not satisfactory. Given the large number of respondents who use this form, the ability to submit these forms electronically should be a priority, on a par similar to other forms SSA has made available electronically due to the volume of their use. Upon resubmission of this form for OMB approval, SSA will either make this form electronically available or provide a detailed justification of why the agency was not able to make the form electronically available. The justification should go well beyond simply asserting that it is not an agency priority and include a timeframe when SSA expects the form will become available electronically. If privacy is a concern, SSA should explain in detail why the information collected on this form is more sensitive than other forms which SSA offers electronically. SSA should also include a description of the available technology to safeguard electronic transmission of data and why these are inadequate.

This form is available on SSA's internet site as a print-only PDF where the overpaid beneficiary can print the form, complete by hand, and mail to SSA. SSA is also working to make this form available as a fill-able form by December 2011. This will enable the overpaid beneficiary to save the incomplete form and return to it later. Once complete, the overpaid beneficiary can mail the completed form to SSA or return it in person to their local office.

Some issues preventing SSA from creating an electronic version of the SSA-632, accessible to the public are:

- A fill-able form would allow a user to alter data on the form; changing the information that SSA is legally and technically required to have on the document;
- Any changes to move from a PDF to a PDF fill-able form would be needed on all forms available to the public and not just the SSA-632-BK;
- A fill-able form would require the user to equip his or her computer with specific software, and specific versions of that software in order to complete, save, or print the form;
- If working from a public computer, the user would need to remember to

clear their information from the form to prevent PII exposure.

Because of these issues, as well as other internal systems-related considerations, the SSA-632-BK is available to the public in a print-only format. New York Regional Office has developed a local intranet application (NY Debt Management Release 2) for Title II overpayments where SSA technicians may complete the form via fill-able PDF. Local field offices may access this intranet application during an interview with the overpaid beneficiary and complete the SSA-632-BK. Alternatively, the local field office may complete part of the form through data entry then print and mail it to the overpaid beneficiary for them to complete and return to SSA. At this time the local intranet application is not a national application; therefore, not used nationwide.

Minor Revisions to the Collection Instrument

SSA is making the following revisions:

We are revising the PRA statement to reflect our current boilerplate language. The current language, which dates back to the last reprint of the form, is now outdated.

SSA's Office of the General Counsel is conducting a systematic review of SSA's Privacy Act Statements on agency forms. As a result, SSA is updating the Privacy Act Statement on the first page of the form.