

**Supporting Statement for Form SSA-8508 BK
Supplemental Security Income (SSI)-
Quality Review Case Analysis
OMB No. 0960-0133**

A. Justification

1. Introduction/Authoring Laws and Regulations

Authority for quality review (QR) of the Supplemental Security Income (SSI) payment process is in Section 1631(d)(1) of the *Social Security Act (the Act)*, which indicates that provisions of Section 205(a) of the *Act* apply under title XVI to the same extent as under title II. Section 205(a) of the *Act* specifies the Commissioner of Social Security shall adopt reasonable proper rules and regulations to regulate and provide for the nature and extent of the proofs and evidence and the methods of taking and furnishing the same in order to establish the right to benefits. Section 1631(e)(1)(B) of the *Act* provides the Social Security Administration (SSA) will not determine eligibility for SSI payments solely on declarations by the applicant, but independent or collateral sources will verify evidence. We will obtain additional information as necessary to assure correct eligibility and payment amount. Section 1611(c)(1) of the *Act* specifies the Commissioner of Social Security may determine eligibility for and the amount of such benefits.

2. Description of Collection

To assess the SSI program and ensure the accuracy of its payments, SSA conducts legally mandated periodic SSI case analysis quality reviews. SSA uses form SSA-8508 to conduct these reviews, collecting information on operating efficiency, the quality of underlying policies, and the effect of incorrect payments. SSA also uses the data to determine SSI program payment accuracy rates, which are a performance measure of the agency's service delivery goals. The respondents are recipients of SSI payments selected for the quality reviews.

Currently, during the interview process, the interviewer will capture the information on the paper version of SSA-8508, and will manually type it into the electronic SSA-8508.

electronic SSA-8508. The electronic SSA-8508 is a standalone Excel application and will reside in the tablet pc and on the user's desktop. Once we implement the electronic SSA-8508 on October 01, 2011, the Quality Review Analyst (QRA) will upload the data to our Electronic Quality Assurance (eQA) system, and have the ability to review or edit the data on an as needed basis, until they close or clear the case.

We will implement the electronic SSA-8508 October 01, 2011. The electronic SSA-8508 is a stand-alone Excel application and will reside in the tablet pc and

on the user's desktop. Once we implement the electronic SSA-8508 on October 01, 2011, the Quality Review Analyst (QEA) will upload the data to our Electronic Quality Assurance (eQA) systems, and have the ability to review or edit the data on an as needed basis, until they close or clear the case.

3. **Use of Information Technology to Collect the Information**
In accordance with the agency's Government Paperwork Elimination Act plan, SSA created an electronic version of form SSA-8508 BK. Based on our data we estimate approximately 95% of respondents under this OMB number use the electronic version. We will use the paper version of form SSA-8508 BK in urgent situations only. Our estimate is approximately 5% of respondents may use the paper version due to extenuating circumstances, and then transfer information to the electronic version.
4. **Why We Cannot Use Duplicate Information**
Duplication of information on Form-SSA-8508-BK is inherent (and necessary) in this process, because we use the data we collect to verify information of record.
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-8508-BK, we would compromise the agency's ability to monitor the accuracy and effectiveness of the SSI program efficiently. We would have no way to establish national accuracy rates or to develop profiles for improving the redetermination process without the information gathered on this interview form. It would be more difficult to make recommendations for corrective action. Because we collect this information on an as needed basis, we cannot collect it less frequently.

There are no technical or legal obstacles that 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 on March 25, 2011, at 76 FR 16847, and SSA has received no public comments. The 30-day FRN published on June 01, 2011 at 76 FR 31671. 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**

Form	Number of Respondents	Frequency of Response	Response Time (minutes)	Estimated annual burden (hours)
SSA-8508-BK (paper interview)	225	1	60	225
SSA-8508-BK (electronic)	4,275	1	60	4,275
Totals	4,500	-	-	4,500

The total burden for this ICR is 4,500 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 \$1.07 million. This estimate is a projection of the costs for conducting our TXVI Stewardship reviews over a 12-month period.

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

There has been a decrease in burden hours. This change stems from the implementation of the electronic form, which will decrease our dependency on the paper version.

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

We publish a report based on Form SSA-8508 BK findings at the end of each sample period, which is available to the public through the Freedom of Information Act upon request. A typical report presents the national payment accuracy rate for the sample period and provides a comparison of the new accuracy rate established for previous periods. It also presents deficiency dollar information by program area, including comparison of current and previous deficiency data.

Error data are broken down into overpayments and underpayments and further analyzed in terms of the five eligibility elements most often involved. We make

an additional distinction between those deficiencies which should be subject to a high degree of control by SSA, or which result from failure of SSA to discharge its responsibilities properly, and those that result from failure of the recipient to report information fully and accurately to SSA. Finally, we provide specific data about the deficiency's source (e.g., failure to report a change, incorrect determination, systems failure) within each of these two categories of responsibility.

17. **Displaying the OMB Approval Expiration Date**

For the paper form SSA-8508-BK, we will not publish 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.

For the Internet version of Form SSA-8508-BK, SSA is not requesting an exception to the requirement to display the OMB approval expiration date.

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).