

**Supporting Statement for the SSA-623, SSA-6230, SSA-6234,
and iRPA (Internet Representative Payee Accounting)
Representative Payee Report (for Adult and Child Beneficiaries
and for Organizational Representative Payees)
20 CFR 404.635, 404.2035, 404.2065, and 416.665
OMB No. 0960-0068**

A. Justification

1. Introduction/Authoring Laws and Regulations

In certain cases, the Social Security Administration (SSA) determines it is not in beneficiaries' best interest to receive their benefits payments directly. As per section 1631(a) of the *Social Security Act* and sections 20 CFR 404.635, 404.2035, 404.2065, and 416.665 of the *Code of Federal Regulations*, in such cases SSA can designate a representative payee to act on behalf of the beneficiaries. To ensure the representative payees are using the payments they receive for the beneficiary they represent, the agency collects the information necessary to make this assessment from representative payees using the SSA-623, SSA-6230, SSA-6234, and through the electronic Internet Representative Payee Accounting (iRPA) application.

2. Description of Collection

When SSA determines it is not in an Old Age Survivors and Disability Insurance (OASDI), or Supplemental Security Income (SSI) recipient's best interest to receive Social Security payments directly, the agency will designate a family member or other person, an organization, state or local government agency, or business to act as the representative payee for the recipient. In this capacity, the person or organization receives the SSA recipient's payments directly and manages these payments.

As part of the stewardship mandate, SSA must ensure the representative payees are using the payments they receive for the recipients they represent. The agency collects the information necessary to make this assessment annually using the SSA-623, the Representative Payee Report (for Adult recipients), SSA-6230, the Representative Payee Report (for Child recipients), SSA-6234, the Representative Payee Report (for Organizational Representative Payees), and through the electronic internet application iRPA. We include a one-page insert informing representative payees about the availability and benefits of using iRPA with the mailings of the paper forms. We use the information from these modalities to determine if the various types of representative payees are using SSA benefits payments in the best interests of the beneficiaries they represent. The respondents are representative payees acting on behalf of OASDI and SSI recipients.

3. Use of Information Technology to Collect the Information

In accordance with the agency's Government Paperwork Elimination Act plan, SSA created an Internet version of forms SSA-623, SSA-6230, and SSA-6234 called iRPA. Based on our data, we estimate approximately 10% of respondents under this OMB number use the electronic version.

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 significantly affect small businesses or other small entities.

6. Consequence of Not Collecting Information or Collecting it Less Frequently

If we did not conduct this information collection, the agency would have no means of ensuring the representative payees use the money they receive from SSA for the beneficiary's benefit. Since we only collect the information annually to reflect the past year's use of SSA payments, 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 April 1, 2011 at 76 FR 18290, and SSA received no public comments. The 30-day Notice published on June 15, 2011 at 76 FR 35067. If we receive any comments in response to the 30-day Notice, we will forward them to OMB. SSA did not consult members of the public in the development or maintenance of this form.

We received comments from the Indiana Department of Child Services (IDCS) suggesting SSA allow all payees to account online; allow IDCS to provide a final accounting as soon as they close out a child's case instead of waiting for SSA's final accounting request; and requesting SSA clarify language on the SSA-6234 to include information specifically needed for foster care agencies. SSA decided not to adopt these suggestions. First, SSA already allows all payees to account online once we confirm the payee's identity using an authentication process, with the exception of those payees who are non-responders to our first and second request to the annual accounting report. Next, we use specific criteria to determine when a final accounting is necessary. Therefore, it is not necessary for IDCS to provide a final accounting for each case IDCS closes out. Finally, based on our discussion with the representative of IDCS who sent these suggestions, the SSA-6234 already requests the necessary information needed from foster care agencies. Therefore, the language on the form does not need to be changed.

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

SSA calculated the burden for these forms and screens in the following chart:

Form #	Number of Respondents	Frequency of Response	Average Burden Per Response (minutes)	Total Annual Burden (hours)
SSA-623	2,378,400	1	15	594,600
SSA-6230	2,875,900	1	15	718,975
SSA-6234	702,100	1	15	175,525
iRPA*	652,500	1	15	163,125
Totals	6,608,900			1,652,225

***One Internet platform encompasses all three paper forms**

The total burden for this ICR is **1,652,225** 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

For paper forms, the annual cost to the Federal Government is approximately \$30,385,000. This estimate is a projection of the costs for printing, distributing the collection instrument, and for collecting the information.

For iRPA, the estimated cost to the Federal Government to collect the information is negligible. Because the cost of maintaining the system which collects this information is accounted for within the cost of maintaining all of SSA’s automated systems, it is not possible to calculate the cost associated with just one Internet application.

15. Program Changes or Adjustments to the Information Collection Request

The increased burden is due to an increase in respondents for the three paper forms. In 2008, we reported a higher burden for iRPA; however, when the agency implemented iRPA in 2008 actual numbers of usage were not available. We now have actual usage numbers for iRPA and used them for the current reported burden hours in #12 above.

16. Plans for Publication Information Collection Results

SSA will not publish the results of this information collection.

17. Displaying the OMB Approval Expiration Date

For the paper forms, SSA-623, SSA-6230, and SSA-6234, 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, iRPA, 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).

B. Collections of Information Employing Statistical Methods

SSA does not use statistical methods for this information collection.