Justification for Non-Substantive Changes for SSA-4641-U2 Authorization for the Social Security Administration to Obtain Account Records from a Financial Institution and Request for Records 20 CFR 416.200, 20 CFR 416.203 OMB No. 0960-0293

<u>Justification for Non-Substantive Changes to the Collection or Resubmission of the Collection within One Year of OMB Approval</u>

Non-substantive change:

Due to the aggressive rollout plan of the Access to Financial Institutions (AFI) initiative and SSA's mandate to reduce issuance of improper payments, we are requesting an increase to the public reporting burden for the "Authorization for the Social Security Administration to Obtain Account Records from a Financial Institution and Request for Records" Form SSA-4641-F4. We are requesting to increase the public burden from 500,000 responses to 3,000,000 responses and total annual burden hours from 50,000 to 119,757 for FY's 11 and 12.

Justification:

In the approved Addendum submitted as part of the SSA-4641 clearance package in April 2010, we mentioned that we would need to amend the public burden of the SSA-4641 once we finalized the AFI implementation strategy. Currently, the number of e4641 transactions is rapidly reaching the current OMB approved public reporting burden of 500,000 responses per year. By the end of FY11, we will implement e4641 nationwide, and we expect its transactions to surpass the 500,000 mark before that time.

By FY12, we estimate the number of e4641 transactions to draw near 3 million per year. Therefore, we are requesting to increase the public reporting burden starting this fiscal year. Meanwhile, we will closely monitor the number of responses, and if we determine that the number of responses will exceed our current authority, we will ask for another update to the burden information.