

Supporting Statement for Form SSA-8010-BK
Statement of Income and Resources
20 CFR 416.207, 416.301-310, 416.704, and 416.708

OMB No. 0960-0124

A. Justification

- 1. Introduction/Authoring Laws and Regulations** - The Social Security Administration (SSA) must establish and verify the amount of earned and unearned income and resources available to individuals applying for or receiving Supplemental Security Income (SSI). This can include income and resources of SSI-ineligible parents, spouses, essential persons (i.e. certain persons who were converted from State welfare rolls in 1974, of which there are less than 100 remaining nationwide); and, for some aliens, their sponsor(s). SSA uses Form SSA-8010-BK to collect the information from those individuals. SSA's authority to do so is contained in *42 U.S.C. 1382; Sections 1612(a), 1613(a), 1614(f), 1621, and 1631(e) of the Social Security Act; and sections 20 CFR 416.207, 416.301-310, 416.704, and 416.708 of the Code of Federal Regulations.*
- 2. Description of Collection** – SSA uses Form SSA-8010-BK to collect and verify income and resource information from individuals whose income and resources may be deemed by law (i.e., considered available) to the SSI claimant or recipient. SSA needs this information to make an initial or continuing SSI eligibility determination. The respondents are persons whose income and resources SSA considers deemed to applicants or recipients of SSI payments. Form SSA-8010-BK is not a self-help form; an SSA interviewer assists the respondent with filling out the form.
- 3. Use of Information Technology to Collect the Information** - Improved information technology that would reduce the burden is not available. The information we collect on the paper version of this form we also collect electronically during a personal or telephone interview using SSA's Modernized SSI Claims System (MSSICS). Approximately 82 percent of the data we collect is via this electronic method.
- 4. Why We Cannot Use Duplicate Information** - Information about income and resources is collected on other forms. However, no other SSA form elicits this information from individuals whose income is subject to deeming, other than an SSI-ineligible spouse.

Forms SSA-8000-BK (OMB Control No. 0960-0229) and SSA-8203-BK (OMB Control No. 0960-0416) request the same (and more) information from an SSI applicant or SSI recipient and the SSI-ineligible spouse. SSA uses form SSA-8010-BK to request income and resource information from

individuals other than the claimant and the claimant's spouse when we need this information to determine SSI eligibility or continuing SSI eligibility (e.g. the parent(s) of an SSI-ineligible son or daughter).

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** - Improper SSI payments would almost certainly result if we did not collect this information or we collected it less frequently. Even though we require affected individuals to report changes in circumstances, SSA must be able to collect these reports through other means, such as a periodic SSI eligibility determination (usually made once a year). 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** - SSA published the 60-day advance Federal Register Notice on March 25, 2011, at 76 FR 16849, and received no public comments. SSA published the 30-day Federal Register Notice on May 26, 2011, at 76 FR 30749. If we receive any public comments in response to the second Notice, we will forward them to OMB. There have been no outside consultations with members of the public.
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** - Approximately 341,000 respondents will use Form SSA-8010-BK annually. Of this total, we estimate 82 percent of the respondents will apply via MSSICS. The estimated response time is 26 minutes, for a total of 147,767 burden hours. The total burden reflects burden hours; we did not calculate a separate cost.

Type of Response	Number of Respondents	Frequency of Response	Average Burden Per Response (minutes)	Total Annual Burden (hours)
Paper	61,380	1	26	26,598
MSSICS	279,620	1	26	121,169
Totals	341,000			147,767

Please note in the chart above, the MSSICS burden information is also included in the burden information for initial SSI claims taken through MSSICS in OMB Control No. 0960-0229 (SSA-8000, SSI application). MSSICS leads the SSA interviewer through a series of paths and questions. The MSSICS full path most closely relates to the paper SSA-8000-BK (SSI application), but it also includes questions from separate SSA forms/OMB clearances, such as the form we are clearing here (SSA-8010-BK). Depending on the response from an applicant, we may ask questions from the SSA-8010-BK as part of the MSSICS full path. MSSICS tracks and provides counts on SSI applications only. MSSICS does not break out separately the number of times we ask questions from a related form, or the time it takes to answer these questions. Consequently, we provide burden information on the MSSICS full path in the clearance package for the SSA-8000-BK (OMB No. 0960-0229) and here.

13. **Annual Cost to the Respondents** – There is no known cost burden to the respondents.
14. **Annual Cost to the Federal Government** - The annual cost to the Federal Government is approximately \$677,431. This estimate is a projection of the costs for printing and distributing the collection instrument and for collecting the information. This estimate represents the 18 percent of respondents who use the paper form.
15. **Program Changes or Adjustments to the Information Collection Request** - There are no changes to the public reporting burden.
16. **Plans for Publication Information Collection Results** - SSA will not publish the results of the information collection.
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)*.

B. Collections of Information Employing Statistical Methods

SSA does not use statistical methods for this information collection.