Justification for Non-Substantive Changes for Form SSA-827 Authorization to Disclose Information to the Social Security Administration 20 CFR 404.1512 and 416.912 OMB No. 0960-0623

Revisions to the Collection

In the FY 2010 Information Collection Budget Report (ICB), the Social Security Administration (SSA) indicated we would reduce the burden on the public by eliminating the need for extra wet-signatures of the SSA-827. While we removed the need to obtain the extra signatures from our instructions for filling out the form, we inadvertently failed to send the appropriate Change Request documentation to OMB to make this procedural revision official. We are correcting for that error now.

When claimants file for Social Security title II or title XVI disability benefits, they must sign the SSA-827, which serves as their written request to a medical provider or other source to release information to SSA. SSA previously required the claimants to sign four SSA-827s because the average claimant had at least that many sources of medical evidence.

Public Law 104-191, the Health Insurance Portability and Accountability Act of 1996 (HIPAA), provides standards covering consent for release of medical information. Prior to HIPAA, no generally accepted set of security standards or general requirements for protecting health information existed in the health care industry. Under HIPAA, a photocopy, fax, electronic data interchange, or scanned image of a wet signature on the SSA-827 is a valid form of authorization. Since the health care industry is moving away from paper processes and relying more heavily on electronic information systems in its business practices, SSA implemented a new procedure to scan and fax images of the SSA-827 into our electronic folder. Thus, we eliminated the need for three of the four signed SSA-827.

Modality	Number of	Frequency	Number of	Average	Total
	Respondents	of Response	Responses	Burden Per	Annual
				Response	Burden
				(minutes)	(hours)
SSA-827	4,121,551	1	4,121,551	10	686,925
Reading	708,100	1	708,100	3	35,405
SSA-827					
Explanation					
on the					
Internet					
Total	4,121,551		4,829,651		722,330

As per the information in the FY 2010 ICB, and based on an increase in the number of respondents for this collection, SSA is updating the burden information as follows: