

**Supporting Statement for Form SSA-L8125-F6 and Automating of the Interim Assistance
Reimbursement (IAR) Process**
20 CFR 416.1901, .1902, .1904, .1906, .1908, .1910, .1920, .1922
OMB Control No. 0960-0546

A. Justification

1. Introduction/Authoring Laws and Regulations

The *Code of Federal Regulations*, 20 CFR 416.1901, 416.1902, 416.1904, 416.1906, 416.1908, 416.1910, 416.1920, 416.1922, Section 1631(g) of the Social Security Act (the Act), Public Law (P.L.) 94-365 of the Act, and P.L. 100-203 of the *Omnibus Budget Reconciliation Act of 1987* authorize the Social Security Administration (SSA) to reimburse State or local Interim Assistance Reimbursement (IAR) agencies for certain payments.

2. Description of Collection

IAR refers to either a State or local agency that receives IAR (Welfare offices Department of Welfare, Department of Social Services, etc.). SSA uses the information Form SSA-L825-F6 provides when an individual receiving the IAR payments signs an authorization form with an IAR agency to allow SSA to repay the IAR agency for funds paid in advance prior to SSA's determination on the individual's claim. The authorization represents the individual's intent to file for Supplemental Security Income (SSI), if they did not file an application prior to SSA receiving the authorization.

Once SSA makes a determination on the SSI claim, SSA notifies the IAR agency of the determination (awards and denials). If SSA denies the claim or does not reinstate SSI benefits, SSA takes no further action unless the individual files an administrative appeal or appeals to a court, as appropriate. If the individual files an appeal, SSA notifies the IAR agency and the claim moves through the appeal process. If SSA ultimately denies the case, neither SSA nor the agency takes further action. If SSA approves the claim or appeal, SSA notifies the IAR agency and the reimbursement process begins.

Thirty-seven States and the District of Columbia participate in the IAR program. The IAR agreements with the States and the District of Columbia include the following requirements (the letters below correspond to those on the chart in #12):

- a. **State Notification of Receipt of Authorization (Electronic Process):** The IAR agency must notify SSA within a certain timeframe that the State has a valid authorization signed by individual allowing SSA to reimburse the State through the IAR process. The IAR agency may do this through one of several State computer exchange processes.
- b. **State Submission of Copy of Authorization (Manual Process):** The IAR agency

must submit to SSA within a certain timeframe a paper copy of the valid authorization signed by the individual allowing SSA to reimburse the State through the IAR process. Some States prefer to use the manual process instead of the electronic process.

- c. **Computation of Amount of Reimbursement Due From SSA (eIAR system):** The electronic Interim Assistance Reimbursement (eIAR) system is an electronic process that uses computer screens located in the Government-to-Government Services Online (GSO) website. If SSA approves the SSI claim or reinstates SSI eligibility, SSA reimburses the IAR agency for assistance it paid the recipient using the eIAR system or the paper Form SSA-L8125-F6.
- d. **State Request for Determination – Dispute Resolution:** If SSA and a state cannot agree on an issue in dispute under the agreement, the state may request that the Commissioner make a determination on the issue. The Commissioner’s determination is final and conclusive. The state maintains the right to seek judicial review. The Commissioner maintains the right to assert lack of jurisdiction with respect to any suit brought under the agreement.
- e. **Form SSA-L8125-F6:** For cases falling under P.L. 100-203 and P.L. 108-203, covering installment payments, dedicated accounts, and direct pay for authorized representatives, SSA must ensure that an IAR agency does not send a residual payment to a recipient affected by these provisions. SSA does not mail the retroactive check to the IAR agency. Instead, at the time of an award or reinstatement, SSA’s automated system generates an SSA-L8125-F6 listing the SSI months and amounts in the IAR period to the agency to record the amounts of the assistance given the recipient in the same month the recipient is eligible for a SSI payment. This automatically produced notice is then printed and mailed to the IAR agency. The IAR agency will then complete and send the form to the servicing SSA field office for issuance of its IAR check.
- f. **State Notification to SSA of Deceased Claimant:** The IAR agency must inform SSA of any deceased claimants. IAR agencies may do this electronically through one of several state exchange processes.
- g. **Review/Signing Agreements:** SSA Regional Office (RO) staff negotiates with the state to agree on the specific agreement for that state. The SSA staff has some leeway in revising the language to accommodate the state. However, the SSA central office must approve any changes. The state attaches to the agreement the list of the political subdivisions within the state that SSA and the state agree can participate in the IAR program.
- h. **Maintenance of Authorization Forms:** The IAR agency retains all notices and authorization forms for the period defined in the IAR agreement for the purpose of SSA verifying transactions covered under the IAR agreement.

- i. **Maintenance of Accounting Forms and Notices:** The IAR agency retains all accounting forms for the period defined in the IAR agreement for the purpose of SSA verifying transactions covered under the IAR agreement.
- j. **Written notice from State to Recipient Regarding Amount of Payment:** The state sends to the recipient a notice explaining (1) the amount of the IAR payment the state paid to the recipient, (2) that SSA will notify the recipient how any remaining SSI money (if any) due him/her will be released by SSA, and (3) the recipient's right to a state hearing.
- k. **Retrieve and Consolidate Authorization and Accounting Forms:** IAR agencies must retrieve and consolidate their authorization and accounting forms for cases SSA RO staff has identified for an audit.
- l. **Participate in Periodic Review:** SSA periodically conducts a sample review of IAR accounting records of paid IAR cases to verify the accuracy of the agency accountability report.

RO staffs review each agency every two or three years and the sample size ranges from 100% of cases (fifteen or fewer) to 35% of cases (greater than seven hundred). SSA provides the sample list to the agency and RO staff conducts an onsite or mail review of the authorization forms, notices to the claimant and accounting forms. Upon completion of the review, the RO staff writes and provides a report of findings to the agency Director and the Associate Commissioner for Income Security Programs, SSA.

- m. **Correct Administrative and Accounting Discrepancies:** During the periodic review, if the RO staff finds accounting errors, the errors are resolved, but not necessarily corrected, prior to the completion of the review. If the IAR agency does not correct the errors immediately, they will make the corrections shortly after the audit and notify the RO of the corrections.

3. **Use of Information Technology to Collect the Information**

All respondents use the eIAR system to report IAR. Currently, 27 States submit paper copies of the IAR authorization form to SSA. The remaining 11 States notify SSA about the IAR authorization using an electronic data exchange process. We encourage States to use the electronic process but we work with the States to accommodate their preferences for submitting the authorizations and, in some cases, to accommodate limitations in a State's computer system.

IAR agencies access the eIAR system using the GSO website. SSA communicates with the IAR agency about an IAR case using the eIAR screens and email messages generated by the eIAR system. The IAR agency communicates with SSA using the IAR screens.

The eIAR system enables the IAR agency to use a web-based process to report to SSA how much money it paid to SSI claimants. When SSA approves an SSI claim, the eIAR system determines how much reimbursement is due to the IAR agency and automatically pays that money to the IAR agency's bank account.

In accordance with the agency's Government Paperwork Elimination Act plan, SSA created an Internet version of the IAR process. Based on our data, we estimate approximately 99% of respondents under this OMB number use the electronic version. SSA processes the remaining 1 percent of reimbursement cases using the paper Form SSA-8125-F6 that requires manual processing by the IAR agency and SSA field offices.

SSA did not create an electronic version of Form SSA-L8125-F6 under the agency's Government Paperwork Elimination Act (GPEA) plan because we estimate that less than 2,000 respondents per year will complete this form. This is less than the GPEA cut-off of 50,000.

We are removing Form SSA-8125, because the eIAR system replaces its functions.

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 affect small businesses or other small entities.

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

If we did not collect this information, the IAR program could not exist. The IAR agencies would not have a way to receive the reimbursement money authorized by the agreement between the State and SSA. SSA collects and uses the information as it becomes available so the IAR agency and the recipient can receive any SSI money due them in a timely manner. Since SSA only collects this information on an as needed basis, we cannot collect it less frequently.

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**

The 60-day advance Federal Register Notice published on August 8, 2011, at 76 FR 48200, and we received no public comments. The 30-day FRN published on December 15, 2011 at 76 FR 78068. If we receive any comments in response to this Notice, we will forward them to OMB.

We consulted with representatives of the IAR agencies when we developed the eIAR screens in 2010. We asked these agencies for their feedback on the design of the screens and the related training materials because they would be the users of these screens. Based on their feedback we modified the eIAR screens to accommodate their preferences where it was feasible in the scope of developing the eIAR system.

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.

In addition, SSA protects information collected electronically through our Privacy Policy for Internet Services that ensures the confidentiality of all information provided by the requester. Our Internet privacy policy is:

- We collect personally identifiable information (name, SSA, DOB or email) only if specifically and knowingly provided by you.
- SSA will use personally identifying information you furnish only in conjunction with services you request as described at the point of collection.
- We sometimes perform statistical analyses of user behavior in order to measure customer interest in the various areas of our site. We will disclose this information to third parties only in aggregate form.
- We do not give, sell, or transfer any personal information to a third party.
- We do not enable “cookies.” (A “cookie” is a file placed on your hard drive by a Web site that allows it to monitor your use of the site, usually without your knowledge.)

SSA will provide access to screens that allow requests for personal information from SSA, allow the individual to make changes to personal information, or allow the individual to register personal and/or business information only upon verification of identity.

11. **Justification for Sensitive Questions**

The information collection does not contain any questions of a sensitive nature.

12. **Estimates of Public Reporting Burden**

Listed below is the burden hour estimate for IAR information collection process included in the IAR Agreement between SSA and the State. The estimate includes reviewing and signing the IAR agreement between the State and SSA, which is a requirement for States that want to participate in the IAR reimbursement process.

Reporting Requirements

Type of Request	Number of Respondents	Frequency of Response	Number of Responses	Average Burden Per Response (minutes)	Estimated Annual Burden Hours (hours)
a) State notification of receipt of authorization (Electronic Process)	11 States	Once per SSI claimant	97,330	1	1622
b) State submission of copy of authorization (Manual Process)	27 States	Once per SSI claimant	68,405	3	3420
c) State submission of amount of IA paid to recipients (using eIAR)	38 States	Once per SSI claimant	101,352	8	13,514
d) State request for determination – dispute resolution	Average is about 2 States per year	As needed	2	30	1
e) State computation of reimbursement due form SSA using paper Form SSA-L8125-F6	38 States	Once per SSI claimant	1,524	30	762
f) State notification to SSA of deceased claimant	20 States	As needed when SSI claimant dies while claim is pending	40	15	10
g)	38 States	Once during life	38	12 hours	456

State reviewing/ signing of IAR Agreement		of the IAR agreement			
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Recordkeeping Requirements

Type of Request	Number of Respondents	Frequency of Response	Number of Responses	Average Burden Per Response (minutes)	Estimated Annual Burden Hours
h) Maintenance of authorization forms	38 States	One form per SSI claimant	165,735 (includes both denied and approved SSI claims)	3	8,287
i) Maintenance of accounting forms and notices	38 States	One set per SSI claimant	101,352	3	5,068

Third Party Disclosure Requirements

Type of Request	Number of Respondents	Frequency of Response	Number of Responses	Average Burden Per Response (minutes)	Estimated Annual Burden Hours
j) Written notice from State to recipient regarding amount of payment	38 States	Once per SSI claimant	101,352	7	11,824

Periodic Review of Agency Accounting Process

Type of Request	Number of Respondents	Frequency of Response	Number of Responses	Average Burden Per Response (hours)	Estimated Annual Burden (hours)

k) Retrieve and consolidate authorization and accounting forms	12 States	One set of forms per SSI claimant for review by SSA once every 2 to 3 years	12	3	36
l) Participate in periodic review	12 States	For review by SSA once every 2 to 3 years	12	16	192
m) Correct administrative and accounting discrepancies	6 States	To correct errors discovered by SSA in periodic review	6	4	24

Total Administrative Burden

	Number of Respondents	Frequency of Response	Number of Responses	Average Burden Per Response	Estimated Annual Burden (hours)
Total	38 States	varies	639,160	varies	45,216

The total burden for this ICR is 45,215 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 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 change in the public reporting burden is due to the implementation of the eIAR system, which reduces the amount of manual processing that occurred previously.

When we last cleared this IC in 2009, we reported an overall annual burden of 46,363 hours for the IAR reimbursement process. We are now estimating about 45,215 annual burden hours. Most of the reduction comes from automating the process for computing the IAR reimbursement that previously was a manual process for the IAR agencies.

16. Plans for Publication Information Collection Results

SSA will not publish the results of the information collection.

17. Displaying the OMB Approval Expiration Date

For the paper form SSA-L8125-F63, 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 electronic version eIAR, 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 CFR1320.9 and related provisions at 5 CFR 1320.8(b) (3).

B. Collections of Information Employing Statistical Methods

SSA is not using statistical methods for this information collection.