**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**

**Justification for Non-Substantive Changes to the Collection or Resubmission of the Collection within One Year of OMB Approval**

**Non-substantive change:**

Due to SSA’s mandate to reduce issuance of improper payments and the completed implementation of the Access to Financial Institutions (AFI) initiative, 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 3,000,000 responses to 5,000,000 responses and total annual burden hours from 119,757 to 160,491 for FY 12.

**Justification:**

In the approved Justification for Non-Substantive Changes for SSA-4641-U2 submitted in February 2011, we mentioned the possibility of amending the public burden of the SSA-4641 once we implemented AFI nationally. In June 2011, we completed the national roll out of the AFI initiative and, as a result, there were over 2.1 million e4641 transactions in FY11.

We now estimate that the number of e4641 transactions will reach approximately 5 million transactions per year. Therefore, we are requesting to increase the public reporting burden for fiscal years 2012 and 2013. 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.

**Estimates of Public Reporting Burden:**

We anticipate approximately 5,000,000 respondents to the form SSA‑4641‑U2 and the e4641 during FY12. We estimate the total annual burden will be 160,491 hours.

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| --- | --- | --- | --- | --- |
| **Collection Method** | **Number of Respondents** | **Frequency of Response** | **Average Burden Per Response (minutes)** | **Estimated Total Annual Burden (hours)** |
| SSA-4641 (paper) | 31,576  | 1 | 6 | 3,158  |
| e4641 (electronic) | 4,968,424  | 1 | 1.9 | 157,333 |
| **Total** | **5,000,000**  |  |  | **160,491** |