

Supporting Statement for Form SSA-2001-F6
Representative Payee Report-Special Veterans Benefits
20 CFR 408.665
OMB No. 0960-0621

A. Justification

- 1. Introduction/Authoring Laws and Regulations** – As per *title VIII* of the Social Security Act (Act), the Social Security Administration (SSA) must provide benefits to certain qualified World War II veterans who reside outside the United States. Section *807(a)* of the Act states that if SSA determines it is not in the best interest of the beneficiary to receive benefits directly, SSA may certify payments to a relative, another person, or organization interested in or concerned about the welfare of the beneficiary. We call these individuals or organizations representative payees. Section *807(h)* requires the Commissioner of Social Security to establish a system of accountability monitoring for representative payees. Section *20 CFR 408.665* of the *Code of Federal Regulations* requires representative payees to account for the use of a beneficiary's benefits.
- 2. Description of Collection** - SSA uses the information on Form SSA-2001-F6 to determine whether the representative payee has used the certified payments properly, and continues to demonstrate strong concern for the beneficiary's best interests. Representative payees who receive Special Veterans Benefits on behalf of beneficiaries residing outside the United States must complete the SSA-2001-F6 annually. We also require representative payees to complete the form any time we have reason to believe they could be misusing the payments.
- 3. Use of Information Technology to Collect the Information** - Due to the low volume of usage, SSA has not scheduled this form for electronic implementation in accordance with the agency's Government Paperwork Elimination Act plan.
- 4. Why We Cannot Use Duplicate Information** - The nature of the information SSA is collecting and the manner in which we are collecting it preclude duplication. SSA has no other collection instrument that collects similar data.
- 5. Minimizing Burden to Small Respondents** - This collection does not affect small businesses or other small entities.
- 6. Consequences of Not Collecting Information or Collecting It Less Frequently** – SSA collects the information annually to determine the continuing suitability of the representative payee. The regulatory requirement is a result of a class action suit filed against SSA; thus, if SSA did not collect the information, we would be in violation of the regulatory requirement. Therefore, we cannot collect the information less frequently.

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 April 10, 2012 at 77 FR 21616. We received no public comments. SSA published the 30-day Federal Register Notice on at June 15, 2012 at 77 FR 36031. If we receive any public comments in response to the 30-day 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 provides no payment or gifts to the respondents.
10. **Assurances of Confidentiality** – SSA protects and holds confidential the information we collect 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 Burden** - Approximately 100 respondents per year use Form SSA-2001-F6. We estimate the burden is about 10 minutes per response. This results in a total of 17 burden hours annually. The total burden represents burden hours, and we did not calculate a separate cost burden.
13. **Annual Cost to the Respondents (Other)** - There is no known cost burden on the respondents.
14. **Annual Cost to the Federal Government** - The annual cost to the Federal Government is approximately \$462. This estimate is a projection of the costs for printing and distributing the collection instrument and for collecting the information.
15. **Program Changes or Adjustments to the Information Collection Request** - There are no changes to the annual 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 exempted SSA from publishing the expiration date for OMB approval on its forms. SSA produces millions of public-use forms, many of which have a life cycle longer than that of an OMB clearance. SSA does not periodically revise and reprint its public-use forms,

(e.g., on an annual basis). OMB granted this exemption so that SSA would not have to stop using otherwise useable editions of forms with outdated expiration dates. In addition, we avoid Government waste because we do not have to destroy and reprint stocks of forms.

18. Exception 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 is not using statistical methods this information collection.