

Supporting Statement for Form SSA-4641-U2
Authorization for the Social Security Administration to Obtain
Account Records from a Financial Institution
20 CFR 416.200 & 416.203
OMB No. 0960-0293

A. Justification

1. Introduction/Authoring Laws and Regulations

*Sections 1631(e)(1) of the Social Security Act (the Act), 20 CFR 416.200 and 20 CFR 416.203 of the Code of Federal Regulations authorize the Social Security Administration (SSA) to collect and verify information on applications for the Supplemental Security Income (SSI) program. Form SSA-4641-U2 complies with the authorization and certification requirements of the *Right to Financial Privacy Act of 1978 (12 USC 35, Sections 3402-3404)*, which specifies conditions that must be met before the account records of financial institutions can be disclosed with customer authorization.*

2. Description of Collection

SSA collects and verifies financial information from individuals applying for SSI to determine if the applicant meets the SSI resources eligibility requirements. If the SSI claimants provide records that are incomplete, unavailable, or seemingly altered, SSA contacts their financial institution to verify the existence, ownership, and value of accounts owned. Financial institutions require individuals to sign Form SSA-4641-U2 to authorize them to disclose records to SSA. The respondents are financial institutions of SSI applicants, recipients, and their demors.

3. Use of Information Technology to Collect the Information

SSA uses an electronic-based financial account verification system for those requiring a wet signature in order to release financial account information. SSA also uses a paper Form SSA-461-U2 for those financial institutions that do not have the capability to respond electronically.

In accordance with the agency's Government Paperwork Elimination Act plan, SSA created an Internet version of Form SSA-461-U2. Based on our data, we estimate approximately 99% of respondents under this OMB number use the electronic version.

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 significantly affect small businesses or other small entities.

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

If we did not use Form SSA-4641-U2, individuals who are unable to secure necessary evidence on their own (due to physical, mental, or financial limitations) could be disadvantaged, and it would create a high risk of incorrect eligibility determinations and incorrect payment of benefits.

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 October 15, 2012, at 77 FR 92593, and we received no public comments. The 30-day FRN published on December 26, 2012 at 77 FR 76160. If we receive any comments in response to this Notice, we will forward them to OMB.

9. **Payment or Gifts to Respondents**

We provide payments to the respondents, who are financial institutions, to compensate them for the time it takes to respond to our request. SSA pays the respondents at a rate determined by the Federal Reserve Board in accordance with the Right to Financial Privacy Act of 1978.

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**

Modality of Completion	Number of Respondents	Frequency of response	Average burden per response (minute)	Estimated total annual burden (hours)
SSA-4641-U2 (paper)	44,100	1	6	4,410
e4641 (electronic)	6,955,900	1	6	231,863
Totals	7,000,000			236,273

The total burden for this ICR is 236,273 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 annual cost to the Federal Government is approximately \$5,161,006. This estimate is a projection of the costs for printing and distributing the collection instrument and for collecting the information. We also compensate the respondents for their costs (see Item 9).

15. **Program Changes or Adjustments to the Information Collection Request**

There has been an increase in the burden hours. The increase stems from our continuing effort to fully implement the Access to Financial Institutions (AFI) initiative. All 50 states, the District of Columbia, and the Northern Mariana Islands are now using AFI, which increase the number of transactions resulting in an increase in burden hours.

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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.