

**Supporting Statement for Form SSA-8202-BK**  
**Statement for Determining Continuing Eligibility for**  
**Supplemental Security Income Payment**  
**20 CFR 416.204**  
**OMB No. 0960-0145**

**A**     **Justification**

1.           **Introduction/Authoring Laws and Regulations**

*Title XVI, part A, Section 1611(c)(1) of the Social Security Act (the Act)* requires that the Commissioner of the Social Security Administration (SSA) shall redetermine eligibility for and the amount of supplemental security income (SSI) benefits.

*20 CFR 416.204 of the Code of Federal Regulations* provides that the SSA conduct redeterminations (RZs) periodically on a scheduled basis, or when we receive notification of a change that would affect an SSI recipient's continued eligibility or payment amount.

2.           **Description of Collection**

SSA uses Form SSA-8202-BK to conduct low and middle error profile telephone or face-to-face RZ interviews with SSI recipients and representative payees. The information SSA collects during the interview is necessary to determine whether (1) SSI recipients met and continue to meet all statutory and regulatory requirements for SSI eligibility and (2) whether they received, and are still receiving, the correct payment amounts.

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

SSA employees document the information gathered during the interview process through our Modernized SSI Claims System (MSSICS) and its paper equivalent Form SSA-8202-BK. In addition, SSA conducts electronic interfaces with records of other government entities to determine whether there are conflicts between the information we have on our system of records and other government entities. However, we must verify any conflicting information we get through these sources with the SSI recipient.

In accordance with the agency's Government Paperwork Elimination Act plan, SSA created an Intranet version of Form SSA-8202-BK. Based on our data, we estimate approximately 85% of respondents under this OMB number use the electronic version.

4.           **Why We Cannot Use Duplicate Information**

Form SSA-8203-BK also collects information similar to that collected by Form SSA-8202-BK. Form SSA-8203-BK (OMB Number 0960-0416) is a more comprehensive, complex redetermination form used to conduct High Error Profile (HEP) redeterminations. It is not a self-help form and is always completed by SSA field office personnel conducting personal contact interviews with MISSICS. Form SSA-8202-BK is a simpler design not intended for use in HEP

redeterminations. Conducting low and middle-error profile (LEP/MEP) redeterminations using Form SSA-8203-BK instead of Form SSA-8202-BK creates an unnecessary burden on the recipients at a higher cost to the Federal government. Therefore, SSA does not use the two forms for the same purpose.

**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 use Form SSA-8202-BK, potential eligibility or events affecting payment might go undetected due to not performing RZs. This can adversely affect recipients through underpayments (i.e., erroneously low benefit payments) or overpayments (excessive benefits payments which will result in collection activities).

We perform MEP redeterminations annually. In addition, (since SSA collects a majority of LEP on a 6-year cycle) we cannot collect it less frequently. Collecting these types of redeterminations less frequently would compromise program integrity.

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 November 29, 2012, at 77 FR 71204, and we received no public comments. The 30-day FRN published on February 07, 2013 at 78 FR 9102. If we receive any comments in response to this Notice, we will forward them to OMB.

**8. 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.

**11. Justification for Sensitive Questions**

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

12. **Estimates of Public Reporting Burden**

<b>Modality of Completion</b>	<b>Number of Respondents</b>	<b>Frequency of Response</b>	<b>Average Burden Per Response (minutes)</b>	<b>Estimated Total Annual Burden (hours)</b>
SSA-8202-BK	6,633	1	21	2,322
MSSICS	71,444	1	20	23,815
<b>Totals</b>	<b>78,077</b>			<b>26,137</b>

This figure represents burden hours, and we did not calculate a separate cost burden.

The total burden for this ICR is 26,137 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 to the respondents.

14. **Annual Cost To Federal Government**

The annual cost to the Federal Government is approximately \$886,533.12. This estimate is a projection of costs for printing, postage, envelopes, and SSA staff time.

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

There has been a decrease in burden hours. The decrease in burden hours is because SSA profiled fewer LEP/MEP RZS due to budget constraints.

15. **Plans for Publication Information Collection Results**

SSA will not publish the results of the information collection.

16. **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.

**17. 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. Collection of Information Employing Statistical Methods**

SSA does not use statistical methods for this information collection.