

**Supporting Statement for Form SSA-8203-BK
Statement for Determining Continuing Eligibility for
Supplemental Security Income Payment
20 CFR 416.204**

OMB No. 0960-0416

A. Justification

1. Introduction/Authoring Laws and Regulations

Title XVI, part A, section 1611(c)(1) of the *Social Security Act* gives the Commissioner of the Social Security Administration (SSA) the authority to redetermine eligibility for and the amount of Supplemental Security Income (SSI) payments. Subpart B, 20 CFR 416.204, of the *Code of Federal Regulations* provides SSA with the authority to make SSI recipient eligibility redeterminations (RZ) periodically on a scheduled basis, or when a recipient informs SSA of a change that would affect the recipient's continued SSI eligibility or payment amount.

2. Description of Collection

For high-error profile (HEP) RZ cases, SSA employees conduct telephone or face-to-face interviews with SSI recipients or their representative payees and document the information gathered during the interview on Form SSA-8203-BK. We use information from the SSA-8203-BK to determine whether SSI recipients (1) have met and continue to meet all statutory and regulatory requirements for SSI eligibility, and (2) have been and are still receiving the correct SSI payment amount. Periodic collection of this information is the only way SSA can make these determinations, and collection of this information is mandatory under the law. The respondents are SSI recipients or their representative payees.

3. SSA's Use of Information Technology to Collect the Information

SSA also collects this information during personal interviews by using the Modernized SSI Claims System (MSSICS), which documents information SSA gathers from the recipient and provides a printed redetermination for the recipient's signature. While we redetermine more than 80 percent of the HEP cases using MSSICS at this time, we continue to redetermine approximately 20 percent of cases using the paper form. We conduct electronic interfaces with records of other government entities to determine whether there are conflicts between the information we have in our system of records and the records of other government entities; however, we must verify any conflicting information we get through these sources with the SSI recipient. Under the current agency's Government Paperwork Elimination Act plan, we have not scheduled the SSA-8203-BK for complete electronic implementation because of the high risk of payment error.

4. Why We Cannot Use Duplicate Information

Some, but not all, of the information SSA collects on Form SSA-8203-BK is also present on Form SSA-8202-BK. SSA uses Form SSA-8202-BK to conduct RZs on middle-error and low-error profile (MEP and LEP) RZ cases either during personal contact interviews conducted by SSA field office personnel (for MEPs), or as a self-help form the respondent completes without assistance from SSA employees (for LEPs). The SSA-8202-BK does not elicit enough information to make accurate determinations of continuing SSI eligibility and payment amounts in HEP RZ cases.

In summary, we use the two forms for different purposes. There is no other similar information or data that SSA can use or modify for this 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

Since the collection of this information is mandatory by law, SSA must collect it. In addition, if we conducted the HEP RZs less frequently, SSA might not detect potential eligibility or events affecting SSI payments for an extended period. Underpayments would adversely affect recipients, which would deprive them of necessary funds owed to them; and by overpayments, which would result in collection activities. There are no technical or legal obstacles preventing 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

SSA published the 60-day advance Federal Register Notice published on December 7, 2012 at 77 FR 73112, and we received no public comments. We published the second Notice published on March 30, 2013, at 78 FR 17276. If we receive any comments in response to our second 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 Reporting Burden

The chart below represents the estimated annual burden associated with this collection activity:

Modality of Collection	Number of Respondents	Frequency of Response	Average Burden per Response (minutes)	Estimated Total Annual Burden (hours)
MSSICS	810,824	1	20	270,275
MSSICS/ Signature Proxy	777,085	1	19	246,077
Paper	27,824	1	20	9,275
Totals	1,615,733			525,627

The total burden represents burden hours, and SSA calculated no separate cost burden.

13. Annual Cost to the Respondents (Other)

There is no known cost burden to the respondents.

14. Annual Cost To Federal Government

The annual cost to the Federal Government is approximately \$167 million; this includes printing, postage, envelopes, and SSA staff time. However, according to SSA's quality-assurance-dollar-impact data, the benefit achieved in terms of prevented/collected overpayments and paid/prevented underpayments, is approximately \$200 million.

15. Program Changes or Adjustments to the Information Collection Request

The increase in the public reporting burden reflects the significant increase in the number of redetermination selections in fiscal year 11.

16. Plans for Publication Information Collection Results

SSA will not publish the results of the information collected.

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. Collection of Information Employing Statistical Methods

SSA does not use statistical methods for this information collection.