

**Supporting Statement for  
Supplemental Security Income Telephone Wage Reporting and  
Supplemental Security Income Mobile Wage Reporting  
20 CFR 416.701-732**

**OMB No. 0960-0715**

**A. Justification**

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

Title II, sections 205(a) and title XVI, section 1631(d) (1) of the *Social Security Act (Act)* authorizes the Commissioner of the Social Security Administration (SSA) to conduct quality review processes. Section 20 CFR 416.701-732 of the *Code of Federal Regulations* require Supplemental Security Income (SSI) recipients to report changes such as, changes in income, resources, and living arrangements that could affect the receipt and amount of their SSI payments.

Section 202 of the *Social Security Protection Act (42 USC 902 note)* requires SSA to issue receipts to SSI recipients, or their representatives, when they report wages.

The President's [Executive Order 13520](#) directs agencies to reduce payment errors and eliminate waste, fraud, and abuse in Federal programs; and to use every tool available to identify and subsequently reclaim the funds associated with improper payments.

SSI stewardship payment accuracy findings point to wages as the first or second largest category of SSI overpayments year after year. Approximately 25 percent of all overpayment deficiency dollars (approximately \$400 million per year) are attributable to wages. Stewardship data indicate that the greater portion of these overpayment dollars is the result of fluctuating income and/or SSI recipient failure to timely report an increase in wages. The amount of wages an SSI recipient or deemor (i.e., ineligible spouse or parent) receives can affect the SSI payment amount or recipient's eligibility status.

We believe we prevent many of these overpayments via our large-scale monthly wage reporting activity involving tens of thousands of SSI recipients, their representative payees, and deemors. The purpose of this collection is to improve SSI recipient payment accuracy via SSI Telephone Wage Reporting (SSITWR) and SSI Mobile Wage Reporting (SSIMWR).

**2. Description of Collection**

The SSITWR is an automated monthly wage reporting process that allows callers to phone a toll-free telephone number to report the prior month of wages.

On August 30, 2012, OMB approved the addition of the SSIMWR application to the existing information collection. SSIMWR is a smartphone application providing an alternate interface for SSI wage reporting and uses the existing SSITWR systems framework. The respondents for the information collections include SSI recipients, deemors,<sup>1</sup> and representative payees<sup>2</sup> of recipients.

Currently, SSA field offices recruit SSI recipients, deemors, and representative payees of SSI recipients who need to report gross monthly wage amounts to report using either SSITWR or SSIMWR. The reporters either call a designated SSA toll-free telephone number or use the smartphone wage reporting application during the first through the sixth day of each month using knowledge-based authentication. The systems cutoff date dictate the 6-day reporting period, and allows the reported wage amounts to post to the Supplemental Security Record in time to prevent potential overpayments and underpayments.

SSITWR and SSIMWR fully automate monthly wage reporting by allowing the respondents to voluntarily report monthly wages by telephone or smartphone application instead of contacting their local FO. Reporters must provide first and last name, other last name if applicable, Social Security number, and date of birth. We compare the authentication information the reporter provides to SSA records to determine the accuracy of the response. The system permits reporters to make the wage report by speaking their responses (through voice recognition technology), keying their responses using the telephone key pad, or keying responses into the smartphone screens. The automated system collects the information and sends it to SSA over secure channels.

SSA intends to continue expansion and usage of the SSITWR system and increase our recruitment efforts. SSA will recruit participants during the course of normal contact with SSA, during an initial claim, pre-effectuation review contact, redetermination, or other post-eligibility contact. Once SSA determines a recipient can participate in SSITWR, the individual receives a training package and instructions regarding how to use the phone system.

On an ad hoc basis, we mail outreach recruitment letters to representative payees of working SSI recipients who have unverified wages on their SSI record. The recruitment letter instructs the representative payee to call the SSITWR system to report monthly wages of the working SSI recipient.

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<sup>1</sup> Note: Deemors are parents of minor children and spouses of an adult SSI recipient whose earned income SSA deems to belong to the recipient and, therefore, reduces the amount of SSI payment.

<sup>2</sup> Note: A representative payee is the person, agency, organization, or institution selected to receive and manage payments on behalf of an incapable SSI recipient. This includes a parent who is receiving payments on behalf of a minor child.

On December 1, 2012, SSA began piloting the SSIMWR smartphone application and offering it as another modality for reporters use. SSA's evaluation of the initial phase of the SSIMWR pilot will determine the length and duration of the entire pilot. With SSIMWR, SSA gives participants an access code, instructions for downloading the smartphone application, and information for how to report wages using their smartphone.

Reporting monthly wages via the SSITWR or SSIMWR systems is voluntary on the part of the recipient, deemor, or representative payee respondents.

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

The SSITWR system collects and transmits data electronically using telephone keypad entry and voice recognition technology. SSI recipients, deemors and representative payees (i.e., users/respondents) reporting monthly wages using SSITWR call an SSA toll-free telephone number that allows them to either speak their responses (voice recognition technology), or key in the information using the numeric identifiers on the telephone.

With SSIMWR, users access the mobile wage reporting application on their smartphone, key in the access code, and the information required for both authentication and for entering wages. SSITWR and SSIMWR systems collect the same information and send it to SSA over secure channels.

SSA decided to use these data gathering technologies because they are widely available to the public and convenient to use. We added the SSIMWR information collection instrument in response to mobile technology advances and increased use. The SSIMWR application uses the existing SSITWR systems framework and current SSITWR process.

This automated information collection is in accordance with SSA's Government Paperwork Elimination Act plan.

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

Form SSA-8150-EV (OMB. No. 0960-0128) is a one-page reporting form that collects some of the same information as that included in this information collection. The form serves as a reminder to individuals the events they need to report and explains why reporting these events is important. We collect the information only once, either by telephone, or on the SSA-8150. Individuals use this form to report changes in writing. We authenticate respondents through telephone speech technology authentication through OMB No. 0960-0596.

SSA also collects information from other sources, such as public and private institutions, employers, and via computer matches with Federal and State agencies. However, to issue SSI payment amounts correctly, in a timely manner, and to prevent potential overpayments, SSA depends primarily on individuals, deemors and their

representative payees to report changes in circumstances when they occur.

**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 collect this information, or collect it in a timely fashion, improper wages would continue to be a leading cause of improper payments in the SSI program. There are no technical or legal obstacles to burden reduction.

**7. Special Circumstances**

There are no special circumstances that would cause SSA to conduct these information collections 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 December 28, 2012 at 77 FR 76591 and we received no public comments. SSA published the second Notice on March 20, 2013 at 78 FR 17276. If we receive any public 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 does not provide payments 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**

<b>Modality of Completion</b>	<b>Number of Respondents Using each Version</b>	<b>Frequency of Response</b>	<b>Response Time (minutes)</b>	<b>Burden (hours)</b>
Training/Instruction	85,000	1	35	49,583
SSITWR	80,000	12	5	80,000
SSIMWR	5,000	12	3	3,000
<b>Totals</b>	<b>85,000*</b>			<b>132,583</b>

\*Currently, 85,000 total respondents may use the SSITWR system. We do not expect this aggregate number to change with the addition of SSIMWR.

The total burden for this ICR is **132,583 hours**. This figure represents burden hours, and we did not calculate a separate cost burden.

**13. Annual Cost to the Respondents (Other)**

These collections do not impose a known cost burden on to the respondents.

**14. Annual Cost To Federal Government**

The annual cost to the Federal Government is approximately \$401,203. This estimate is a projection of the costs for collecting the information.

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

There are no changes to the public reporting burden.

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

SSA will not publish the results of the information collections.

**17. Displaying the OMB Expiration Date**

SSA is not requesting an exception to the requirement to display the OMB expiration date.

**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. Collection of Information Employing Statistical Methods**

SSA does not use statistical methods for these information collections.