

**Supporting Statement For
Beneficiary Interview and Auditor's Observations Form SSA-322
OMB No. 0960-0630**

A. Justification

1. Introduction/Authoring Laws and Regulations

The Social Security Administration's (SSA) Office of Inspector General (OIG) needs to collect information from Supplemental Security Income recipients and Old-Age, Survivors and Disability Insurance beneficiaries that have a representative payee. The information on form SSA 322, Beneficiary Interview and Auditor's Observations is necessary to augment other data for determining whether representative payees are complying with their duties under 20 CFR 404.2035 and 416.635.

As per Sections 205 (j) (3) (A) and 1631 (a) (2) (C) (i) of the *Social Security Act* (the Act). The OIG's authority to collect the information is in the *Inspector General Act of 1978*, as amended, (Public Law No. 95-452, 5 U.S.C. App. 3).

2. Description of Collection

SSA's OIG collects information through Form SSA-322, the Beneficiary Interview and Auditor's Observation form, to interview beneficiaries or their and responsibilities. SSA randomly selects Supplemental Security Income recipients and Social Security beneficiaries who have representative payees as respondents for this collection

3. Use of Information Technology to Collect the Information

SSA conducts in-person interviews along with overall observations by the OIG interviewer. SSA did not create an electronic version of Form SSA-322 under the agency's Government Paperwork Elimination Act (GPEA) plan because only 250 respondents complete the form. This is less than the GPEA cut-off of 50,000.

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-322, we would have no means to directly confirm that representative payees are complying with their duties and responsibilities. Because we collect the information on an as needed basis, we cannot collect it less frequently.

There are no technical or legal obstacles to prevent 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 February 07, 2013, at 78 FR 9102, and we received no public comments. The 30-day FRN published on April 17, 2013 at 78 FR22935. If we receive any comments in response to this Notice, we will forward them to OMB. We did not consult with the public in the revision of this form.

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 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**

Collection Method	Number of Respondents	Frequency of response	Average burden per response (minutes)	Estimated total annual burden (hours)
SSA-322	1,000	1	15	250

The total burden for this ICR is 250 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 \$21,395. This estimate is a projection of the costs for printing and collecting the information.
15. **Program Changes or Adjustments to the Information Collection Request**
There has been an increase in burden hours. This change stems from SSA performing more audits of representative payees.
16. **Plans for Publication Information Collection Results**
SSA will not publish the results of specific individuals identified from 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 requirement to display an expiration date.

B. Collections of Information Employing Statistical Methods

SSA does not use statistical methods for this information collection.