**Justification for Non-Substantive Changes for SSA-4641-U2**

**Authorization for the Social Security Administration to Obtain Account Records from a Financial Institution and Request for Records**

**20 CFR 416.200, 20 CFR 416.203**

**OMB No. 0960-0293**

**Revisions to the Collection**

Due to SSA’s mandate to reduce issuance of improper payments, and our continued implementation of the Access to Financial Institutions (AFI) initiative, we are requesting to increase the public reporting burden for Form SSA-4641-U2, Authorization for the Social Security Administration to Obtain Account Records from a Financial Institution and Request for Records. We request to increase the public burden from 7,000,000 responses to 16,000,000 responses, increasing the total annual burden hours from 236,273 to 540,053 for Fiscal Year (FY) 2013 and continuing. This increase will ensure a more accurate burden estimate for the full implementation of AFI.

**Background:**

In the Supporting Statement for Form SSA-4641-U2 approved on 2/4/13, we requested a public reporting burden for the SSA 4641-U2 based on the partial implementation of AFI. The partial AFI implementation consisted of a $750 liquid resource tolerance and up to five searches for possible undisclosed accounts per individual. As the agency keeps working towards AFI’s full implementation, we expect AFI transactions to increase significantly.

We are planning to lower our liquid resource tolerance from $750 to $400 and increase the number of searches for undisclosed accounts from five to up to ten searches per individual by late October 2013. We expect AFI transactions to surpass the current OMB approved public reporting burden of 7,000,000 responses per year before that time. Meanwhile, we will closely monitor the number of responses, and if we determine that the number of responses will exceed our current authority, we will ask for another update to the burden information.

**Estimates of Public Reporting Burden:**

We anticipate approximately 16,000,000 respondents to the form SSA‑4641‑U2 and the e4641 during FY2013 and continuing. We estimate the total annual burden will be 540,053 hours.

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| **Modality of Completion** | **Number of Respondents Using each Version** | **Response Time (minutes)** | **Burden (hours)** |
| SSA-4641 (paper) | 100,800 | 6 | 10,080 |
| e4641 (electronic) | 15,899,200 | 2 | 529,973 |
| **Totals** | 16,000,000 |  | **540,053** |

**Justification for Resubmission of the Collection within One Year of OMB Approval**

When we submitted the information collection request in January 2013, we did not anticipate our increase from 5,000,000 to 7,000,000 responses would not be enough for AFI implementation. However, our current management information shows we need to increase our responses further as we continue to implement AFI. Therefore, we request this significant increase in responses now before the actual number of responses increases beyond our requested estimate which OMB approved on 2/4/13.