

Supporting Statement for Form SSA-8150
Reporting Events – SSI
20 CFR 416.701 – 416.732
OMB No. 0960-0128

A. Justification

1. Introduction/Authoring Laws and Regulations

SSA requires Supplemental Security Income (SSI) recipients, or their representatives, to report changes in their income, resources, and living arrangements, since these factors may require a change in their payment amount or eligibility status. Section 1631(e) of the *Social Security Act* authorizes SSA to collect this information, and 20 CFR 416.701 - 416.732 of the *Code of Federal Regulations* describes the types of changes SSI recipients should report; the reporting modalities they may use; and the possible penalties for failing to report eligibility-changing events. SSA uses Form SSA-8150, a self-mailer containing instructions and questions formulated to capture changes of information regarding SSI recipients' income, resources, living arrangements, and any other eligibility-changing events, to collect this information.

2. Description of Collection

SSA collects the information on Form SSA-8150 to determine changes in SSI eligibility and amounts. SSA mails the SSA-8150 to SSI recipients when they allege payment or eligibility-changing events. Either the SSI recipient fills out the paper version of the form, or they complete the form through an in-person or telephone interview with an SSA employee who records the information using the Modernized SSI Claims System (MSSICS). In addition to the SSA-8150, recipients may need to submit supplementary documentation showing the payment or eligibility-changing events (e.g., payment stubs, or rental agreements). The respondents are current SSI recipients, or their representatives, who experience a payment or eligibility-changing event.

3. Use of Information Technology to Collect the Information

We estimate approximately 95% of respondents complete the SSA-8150 through a personal interview with an SSA employee who records the information using MSSICS. We have not, yet, created an Internet version of the SSA-8150 as fewer than 50,000 respondents use this form annually, which falls below our Government Paperwork Elimination Act cutoff for creating Internet versions.

4. Why We Cannot Use Duplicate Information

The SSA-8150 asks for information we already collect during redeterminations and limited issue reports. However, we conduct the redeterminations and limited issue reports periodically, and do not always include every SSI recipient annually. The SSA-8150 is unique in that it allows the SSI recipients to report their eligibility-changing data between the redetermination and limited issue report periods, preventing overpayments and underpayments.

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 SSA did not collect this information, we would have no means of redetermining SSI eligibility or payment amounts at the times when SSI recipients experience circumstantial changes that may affect their SSI payments. This could result in over- or underpayments, or the suspension of SSI payments for the recipients who could not report eligibility-affecting changes at the time when they occur. As we only collect this information when an SSI recipient alleges a payment or eligibility-changing event, we cannot collect it less frequently. 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 December 31, 2013, at 78 FR 79723, and we received no public comments. SSA published the second Notice on March 28, 2014, at 79 FR 17632. If we receive comments in response to the 30-day 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

Approximately 36,767 respondents take 5 minutes each to complete Form SSA-8150 annually. Accordingly, the burden is 3,064 hours. This figure represents burden hours, and we did not calculate a separate cost burden. As mentioned in #3 above, approximately 95% of all respondents complete the form through a personal interview with an SSA employee who collects the data electronically through MSSICS. Since it takes the same amount of time to complete this form no matter the modality, we did not create a burden chart for this collection.

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 \$63,332. This estimate is a projection of the costs for printing and distributing the collection instrument, and for collecting the information.

15. Program Changes or Adjustments to the Information Collection Request

The burden increase for this collection is due to an increase in the total number of respondents as shown through our current management information.

16. Plans for Publication Information Collection Results

SSA will not publish the results of 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 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.