

**Supporting Statement for
RSI/DI Quality Review Case Analysis - Sampled Number Holder; Auxiliaries/Survivors; Parent;
Stewardship Annual Earnings Test
OMB: 0960-0189**

A. Justification

1. Introduction/Authorizing Laws and Regulations

Section 205(a) of the *Social Security Act (the Act)* authorizes the Commissioner of the Social Security Administration (SSA) to conduct the quality review process, which entails collecting information related to the accuracy of payments made under the Old-Age, Survivors, and Disability Insurance Program (OASDI). *Sections 228(a)(3), 1614(a)(1)(B), and 1836(2)* of the *Act* require a determination of the citizenship or alien status of the beneficiary; this is only one item that we might question as part of the Annual Quality review.

2. Description of Collection

SSA uses the forms in this collection to investigate the accuracy of payments for multiple programs. See below for a list of these forms and the issues they investigate: SSA uses Form SSA-4659 to evaluate the effectiveness of the annual earnings test and to implement ongoing improvements in the process. About twenty-five percent of respondents will have in-person reviews and receive one of the following appointment letters: (1) SSA-L8550-U3 (Appointment Letter--Sample Individual); (2) SSA-L8551-U3 (Appointment Letter--Sample Family); or (3) the SSA-L8552-U3 (Appointment Letter--Rep Payee). Seventy-five percent of respondents will receive a notice for a telephone review using the SSA-L8553-U3 (Beneficiary Telephone Contact) or the SSA-L8554-U3 (Rep Payee Telephone Contact). To help the beneficiary prepare for the interview, we include three forms with each notice: (1) SSA-85 (Information Needed to Review Your Social Security Claim) lists the information the beneficiary will need to gather for the interview; (2) SSA-2935 (Authorization to the Social Security Administration to Obtain Personal Information) verifies the beneficiary's correct payment amount, if necessary; and (3) SSA-8552 (Interview Confirmation) confirms or reschedules the interview if necessary. The respondents are a statistically valid sample of all OASDI beneficiaries in current pay status or their representative payees.

3. Use of Information Technology to Collect the Information

While these forms are available as PDF versions on the SSA website, beneficiaries never fill out the forms directly. All of the information on these forms is collected through interviews with the beneficiaries. SSA conducts an estimated 75% of these interviews over the telephone and 25% face-to-face in a field office. The SSA employee conducting the interview writes down the answers to the questions directly on the paper form, for both telephone and in-person interviews. SSA did not create an electronic version of these forms under the agency's Government Paperwork

Elimination Act (GPEA) plan because only 18,100 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 affect small businesses or other small entities.

6. **Consequence of Not Collecting Information or Collecting it Less Frequently**

If we did not use these forms, SSA would have no way to effectively evaluate and recommend ongoing improvements for the OASDI program. In addition, insufficient coverage would result, data on the effects of policy and program changes would be lost, and users of this data (including Congress, SSA, other Federal agencies, the media, and the general public) would have to plan without firm knowledge of program characteristics. Because we only collect the information on an as-needed basis, 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 January 07, 2014, at 79 FR 889, and we received no public comments. The 30-day Notice published on March 21, 2014 79 FR 15782. If we receive any comments in response to this Notice, we will forward them to OMB. We did not consult with the public in maintenance 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**

Modality of Completion	Number of Responses	Frequency of Response	Average burden per response (minutes)	Estimated Total Annual Burden (hours)
SSA-2930	1,500	1	30	750
SSA-2931	850	1	30	408
SSA-4659	325	1	10	54
SSA-L8550-U3	385	1	5	32
SSA-L8551-U3	95	1	5	8
SSA-L8552-U3	35	1	5	3
SSA-L8553-U3	4490	1	5	374
SSA-L8554-U3	670	1	5	56
SSA-8552	2350	1	5	196
SSA-85	3850	1	5	320
SSA-2935	2350	1	5	196
SSA-820/821(also saved under OMB: 0960-0598 and 0960-0059)	400	1	15	100
SSA-8510 (also saved under OMB No. 0960-0707)	800	1	5	67
Totals	18,100			2,582

The total burden for this ICR is 2,582 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 \$3,317. This estimate is a projection of the costs for processing and for collecting the information.

15. **Program Changes or Adjustments to the Information Collection Request**
There is an increase in burden hours. This change stems from the discontinuation of the iClaim Stewardship Questionnaire in 2013.
16. **Plans for Publication Information Collection Results**
Results of the information collection are prepared and published by the Office of Quality Review (OQR).
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).