## Supporting Statement for Form SSA-1414 Credit Card Payment Form OMB No. 0960-0648

#### A. Justification

## 1. Introduction/Authoring Laws and Regulations

Section 702(a)(4) of the Social Security Act gives the Commissioner the responsibility and power to discharge all duties of the Social Security Administration (SSA), and the full authority and control over all personnel and activities. For many years, the Federal government has been accepting credit card payments for debts owed by individuals and businesses. The Department of the Treasury, which creates the Federal government's general debt collection policy and procedures, has long encouraged the use of electronic funds transfer, including credit cards, for repaying debts. It is a long-standing business practice used by other Federal agencies as well as SSA. Form SSA-1414 ensures SSA collects all of the necessary information from a debtor to collect and process payment.

#### 2. **Description of Collection**

SSA uses the information collected on Form SSA-1414 to process payments from former employees and vendors who have outstanding debts owed to the agency. We also use the information to process advance payments for reimbursable agreements. Additionally, we use the SSA-1414 to process credit card payments for fees in the Field Office including copies of material in claims files, or other materials and services requested under the Freedom of Information Act (FOIA). SSA developed this form as a convenient method for respondents to satisfy such debts through a credit card payment. The respondents are former employees and vendors who have debts still owed to the agency, and individuals who request information through FOIA.

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

SSA has not currently scheduled Form SSA-1414 for electronic implementation because of the form's low volume of usage and the need to prioritize higher volume collections. SSA will consider this form as a candidate for electronic implementation during future reviews.

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

There are other credit card forms that collect information similar to that of the SSA-1414. However, each form is case – or program – specific, often involving different operating components and authorized by varying statutes and regulations. Therefore, there is no duplication of the information.

#### 5. **Minimizing Burden on Small Respondents**

This collection does not affect a substantial number of small businesses or other small entities.

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

If SSA did not collect the information on Form SSA-1414, the agency would not be able to process credit card payments from former employees and vendors who have debts still owed to the agency or from individuals requesting certain information through FOIA. Since SSA collects this information on a case by case basis, we cannot collect it less frequently. There are no technical or legal obstacles that prevent burden reduction.

#### 7. **Special Circumstances**

There are no special circumstances that would cause SSA to collect this information 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 October 20, 2011, at 76 FR 65315, and SSA received no public comments. The second Notice published on January 3, 2012 at 77 FR 147. If we receive any comments in response to the 30-day Notice, we will forward them to OMB. SSA did not consult members of the public in the development or maintenance of this form.

## 9. **Payment or Gifts to Respondents**

SSA provides no payments or gifts to 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 6,000 respondents complete the form 1 time each annually, for a total of 6,000 responses. The estimated average response time is 2 minutes for a total of 200 burden hours. SSA reflects the total burden as burden hours, and has calculated no separate cost burden.

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

There is no known cost burden to the respondents.

#### 14. Annual Cost To Federal Government

The annual cost to the Federal Government is approximately \$2,640. This estimate is a projection of printing and distribution expenditures for the form and the cost of collecting the information.

15. **Program Changes or Adjustments to the Information Collection Request** SSA now authorizes all regional field offices to use this form for processing FOIA requests. In addition, our review indicated that the length of time to complete this form should be reduced from 5 minutes to 2 minutes.

# 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. <u>Collections of Information Employing Statistical Methods</u>

SSA is not using statistical methods for this information collection.