

**Supporting Statement for Form SSA-8508 BK  
Supplemental Security Income (SSI) -  
Quality Review Case Analysis  
OMB No. 0960-0133**

**A. Justification**

**1. Introduction/Authoring Laws and Regulations**

Section 1631(d)(1) of the *Social Security Act (Act)* authorizes the Social Security Administration (SSA) to conduct quality reviews of the Supplemental Security Income (SSI) payment process. Provisions of section 205(a) of the *Act* apply under Title XVI to the same extent as under Title II. Section 205(a) of the *Act* specifies the Commissioner of Social Security adopt rules and regulations to regulate and provide for the nature and extent of proofs, evidence, and methods for taking and furnishing information to establish a person's rights to benefits. Section 1631(e)(1)(B) of the *Act* provides SSA will not determine eligibility for SSI payments solely on an applicant's declarations, but will verify eligibility via independent or collateral sources. SSA will obtain additional information as needed to assure an SSI claimant's continued eligibility and correct SSI payment amount. Section 1611(c)(1) of the *Act* specifies the Commissioner of Social Security may determine eligibility for and the amount of SSI payments.

**2. Description of Collection**

To assess the SSI program and ensure the accuracy of its payments, SSA conducts legally mandated periodic SSI case analysis quality reviews. SSA uses Form SSA-8508 to conduct these reviews, collecting information on operating efficiency, the quality of underlying policies, and the effect of incorrect payments.

SSA employees collect this information during a telephone interview with the respondent. The information collected on Form SSA-8508-BK provides an ongoing assessment of the effectiveness of the SSI program, including the effect of incorrect payments. SSA also uses data collected through this process to establish a Federal payment accuracy rate, which is used as one of the performance measures for the agency's service delivery goals. Respondents are participants in the SSI program.

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

In accordance with the agency's Government Paperwork Elimination Act plan, SSA created an electronic version of Form SSA-8508 BK. Based on our data, we estimate approximately 95 percent of respondents use the electronic version. We estimate conducting 5 percent of respondent interviews using the paper version of Form SSA-8508 in extenuating circumstances, which we then transfer the information to the electronic version.

4. **Why We Cannot Use Duplicate Information**  
Duplication of information on Form-SSA-8508-BK is inherent (and necessary) in this process because we use the data we collect to verify information of record.
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 Form SSA-8508-BK, we would compromise the agency's ability to monitor the accuracy and effectiveness of the SSI program efficiently. We would have no way to establish national accuracy rates or to develop profiles for improving the redetermination process without the information gathered on this interview form. We would find making recommendations for corrective action more difficult without it. Because we collect this information on an as needed 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 conduct this information collection in a manner inconsistent with *5 CFR 1320.5*.
8. **Solicitation of Public Comment and Other Consultations with the Public**  
SSA published the 60-day advance Federal Register Notice on April 16, 2014, at 79 FR 21499, and we received no public comments. We published the 30-day FRN on July 2, 2014 at 79 FR 37828. If we receive any comments in response to this Notice, we will forward them to OMB.
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 we collect 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**

<b>Modality of Completion</b>	<b>Number of Respondents</b>	<b>Frequency of Response</b>	<b>Response Time (minutes)</b>	<b>Estimated Total Annual Burden (hours)</b>
SSA-8508-BK (paper interview)	225	1	60	225
SSA-8508-BK (electronic)	4,275	1	60	4,275
<b>Totals</b>	<b>4,500</b>			<b>4,500</b>

The total burden for this information collection request is 4,500 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 \$1.07 million. This estimate is a projection of the costs for conducting our Title XVI stewardship reviews over a 12-month period.

**15. Program Changes or Adjustments to the Information Collection Request**

There are no changes in the public reporting burden.

**16. Plans for Publication Information Collection Results**

We publish a report based on Form SSA-8508 BK findings at the end of each sample period, which is available to the public through the *Freedom of Information Act* upon request. A typical report presents the national payment accuracy rate for the sample period and provides a comparison of the new accuracy rate established for previous periods. It also presents deficiency dollar information by program area, including comparison of current and previous deficiency data.

We break down the error data into overpayments and underpayments and conduct further analysis in terms of the five eligibility elements most often involved. We make an additional distinction between those deficiencies which should be subject to a high degree of control by SSA, or which result from failure of SSA to discharge its responsibilities properly, and those that result from failure of the recipient to report information fully and accurately to SSA. Finally, we provide specific data about the deficiency's source (e.g., failure to report a change, incorrect determination, systems failure) within each of these two categories of responsibility.

**17. Displaying the OMB Approval Expiration Date**

For the paper form SSA-8508-BK, we will not publish 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.

For the electronic version of Form SSA-8508-BK, SSA is not requesting an exception to the requirement to display the OMB approval expiration date.

**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).