

**Supporting Statement for Forms SSA-1712,
Notice of Reclamation - Canada Payment Made in United States, and
SSA-1713, Statement of Reclamation Action
31 CFR 210**

OMB No. 0960-0734

A. Justification

1. Introduction/Authoring Laws and Regulations

The Federal Government Participation in the Automated Clearing House at *31 CFR 210* of the *Code of Federal Regulations* provides the authority for the Social Security Administration (SSA) to send benefit payments to Social Security beneficiaries, at their request, to Canadian financial institutions (FI). The regulation also provides the authority for SSA to reclaim from a Canadian FI, any benefits erroneously paid after the death of the beneficiary.

2. Description of Collection

SSA uses Form SSA-1713 to collect information we need to determine if a Canadian bank is able to return erroneous payments, and to determine how and when it can return the payments made after the death of a recipient who elects to have payments sent to Canada.

Form SSA-1712 (Notice of Reclamation-Canada Payment Made in the United States), or SSA-1712 CN (Notice of Reclamation-Canada Payment made in Canada) is the cover sheet SSA prepares to request return of a payment erroneously made after the death of the recipient. SSA sends Form SSA-1712 with Form SSA-1713. Businesses and non-profit organizations complete the same forms. The respondents are Canadian FIs who received Social Security payments.

When the Federal Reserve Bank of New York (FRBNY) is responsible for reclaiming an improper payment sent to Canada, FRBNY uses a similar form they designed for this purpose. However, SSA's Office of International Operations (OIO) is responsible for the reclamation when:

- The outstanding amount is less than \$100; or
- FRBNY has already made two unsuccessful attempts to reclaim the funds through the FI; or,
- FRBNY has already reclaimed a portion of the funds, but some of the erroneously paid money remains outstanding.

If the FI is the entity that reported the death via a returned payment, SSA does not request Forms SSA-1712 and SSA-1713.

- 3. Use of Information Technology to Collect the Information**
SSA did not create an electronic version of these forms under the agency's Government Paperwork Elimination Act plan because of the low number of respondents completing these forms each year.
- 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 significantly affect small businesses or other small entities.
- 6. Consequence of Not Collecting Information or Collecting it Less Frequently**
If SSA did not collect the information, we would not be able to track erroneous payments sent to FIs in Canada. In addition, since SSA collects 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 March 19, 2015, at 80 FR 14432, and we received no public comments. SSA published the 30-day Notice on May 22, 2015, at 80 FR 29789. If we receive any public comments in response to the second Notice, we will forward them to OMB. There have been no outside consultations with members of the public.
- 9. Payment or Gifts to Respondents**
SSA provides no 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**

Approximately 15 respondents (8 business respondents and 7 non-profit respondents) take 5 minutes each to complete Form SSA-1712 and SSA-1713 each year. Accordingly, the annual burden is 1 hour. 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 \$23. 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**

There are no changes to the public reporting burden.
 - 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. Collections of Information Employing Statistical Methods**

SSA does not use statistical methods for this information collection.