# Supporting Statement for Form SSA-2001-F6 Representative Payee Report-Special Veterans Benefits 20 CFR 408.665 OMB No. 0960-0621

# A. <u>Justification</u>

## 1. Introduction/Authoring Laws and Regulations

As per *Title VIII* of the Social Security Act (Act), the Social Security Administration (SSA) must provide benefits to certain qualified World War II veterans who reside outside the United States. Section 807(a) of the *Act* states that if SSA determines it is not in the best interest of the beneficiary to receive benefits directly, SSA may certify payments to a relative, another person, or organization interested in or concerned about the welfare of the beneficiary. We call these individuals or organizations representative payees. Section 807(h) of the *Act* requires the Commissioner of Social Security to establish a system of accountability monitoring for representative payees. Section 20 CFR 408.665 of the Code of Federal Regulations requires representative payees to account for the use of a beneficiary's benefits.

## 2. **Description of Collection**

SSA uses the information on Form SSA-2001-F6 to determine whether the representative payee used the certified payments properly, and continues to demonstrate strong concern for the beneficiary's best interests. Representative payees who receive Special Veterans Benefits on behalf of beneficiaries residing outside the United States must complete the SSA-2001-F6 annually. We also require representative payees to complete the form any time we have reason to believe they could be misusing the benefit payments. The respondents are individuals or organizations serving as representative payees who receive Special Veterans Benefits on behalf of beneficiaries living outside the United States.

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

Form SSA-2001-F6 is in paper form only and is not available as a print-only PDF on SSA's website. SSA did not create an electronic version of form SSA-2001-F6 under the agency's Government Paperwork Elimination Act plan because of the low volume of respondents who are required to complete the form.

## 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 to Small Respondents

This collection does not affect small businesses or other small entities.

6. **Consequences of Not Collecting Information or Collecting It Less Frequently** SSA collects the information annually to determine the continuing suitability of the representative payee. The regulatory requirement is a result of a class action suit filed

against SSA; thus, if SSA did not collect the information, we would be in violation of the regulatory requirement. Therefore, we cannot collect the information 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 April 2, 2015, at 80 FR 17817, and we received no public comments. SSA published the second Notice on June 19, 2015, at 80 FR 35423. 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 Burden

Approximately 50 respondents take 10 minutes each to complete Form SSA-2001-F6 each year. Accordingly, the burden is 8 hours. This figure represents burden hours, and we did not calculate a separate cost burden.

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

There is no known cost burden on the respondents.

#### 14. Annual Cost to the Federal Government

The annual cost to the Federal Government is approximately \$240. 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 decrease stems from a decrease in the amount of respondents from 100 to 50. We expect the burden to decrease further in the future, as the beneficiaries for the Special Veterans Benefits are a dying population, and, as they decrease, so does their need for representative payees.

#### 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 exempted SSA 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 that SSA would not have to destroy stocks of otherwise useable forms with expired OMB approval dates, avoiding Government waste.

# 18. Exception 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 this information collection.