

**Supporting Statement for Form SSA-8510**  
**Authorization for the Social Security Administration to Obtain Personal Information**  
**20 CFR 404.704; 404.820 - 404.823; 404.1926; 416.203; and 418.3001**  
**OMB No. 0960-NEW**

**A. Justification**

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

The Social Security Administration (SSA) has authority to establish the necessary provisions to obtain proofs and evidence regarding eligibility for Social Security programs. Under Title II and Title XVI of the *Social Security Act (Act)*, SSA determines eligibility and entitlement to our programs through the collection of the proof and evidence supporting the application for benefits as per Sections 205(a) and 1631(e) of the *Act*. In addition, Sections 20 CFR 404.704, 404.1926, 416.203, and 418.3001 of the *Code of Federal Regulations (Code)* explain the different requirements for providing evidence regarding eligibility for SSA programs, and sections 404.820 – 404.823 of the *Code* detail requirements of proof when individuals request changes to their SSA files. The public can use Form SSA-8510 to provide us with authorization to obtain information from a public or private custodian of records.

SSA previously obtained OMB approval for the SSA-8510 under OMB Control Number 0960-0707 for limited use with claimants of Medicare Part D subsidies. However, we are currently expanding the scope of use for this form, and, therefore, we are requesting OMB approval as a stand-alone form (see Addendum for further details).

**2. Description of Collection**

SSA uses the information we gather on the SSA-8510 to determine if individuals are eligible for specific Social Security or Medicare Part D benefits, or for Supplemental Security Income (SSI) payments. SSA uses the SSA-8510 to contact a public or private custodian of records and request evidence information to support a benefit application or payment continuation. We ask for evidence information such as the following:

- Age requirements (e.g. birth certificate, court documents)
- Insured status (e.g. earnings, employer verification)
- Marriage or divorce information
- Pension Offsets
- Wages verification
- Annuities
- Property information
- Benefit verification from a State agency or third party
- Immigration status (rare instances)
- Income verification from public agencies or private individuals
- Unemployment benefits
- Insurance Policies

If the custodian requires a signed authorization from the individual(s) whose information

SSA requests, SSA provides the custodian with a copy of the SSA-8510. The respondent completes the SSA-8510, either using the paper form, or through a personal interview during which an SSA employee completes the Modernized Supplemental Security Income Claims System (MSSICS) screens which SSA will have in place by the end of the fiscal year (see #3 below for more details). Once SSA receives the completed form, we use it as the authorization to obtain personal information regarding the respondent from third parties until the authorizing person (respondent) revokes the permission of its usage or withdraws the claim. The collection is voluntary; however, failure to verify the individuals' eligibility can prevent SSA from making an accurate and timely decision for their Social Security benefits or SSI payments. The respondents are individuals who file for or currently receive Social Security benefits, SSI payments, or Medicare Part D subsidies.

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

Form SSA-8510 is available on SSA's website for individuals to print, complete, and mail to SSA for processing. By the end of this fiscal year, SSA will also offer a stand-alone electronic version of the form to support payment eligibility. The new electronic version can be completed via an in-office or telephone interview during which the field office employee enters the information into MSSICS and prints it if needed. As always, our MSSICS screens mirror the paper version using an electronic collection method. However, unlike the paper version, MSSICS also propagates identity and similar information to other screens in the application. In addition, the in-person or telephone interview MSSICS process offers the advantage of improving the information accuracy in recording responses.

**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 collect similar data. We use the SSA-8510 generic language form to request various type of information except for information from medical sources, which we collect using the SSA-827 (0960-0623), or information from Financial institutions, which we collect using the SSA-4641 (0960-0293).

**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**

Failure to collect the information on the SSA-8510 prevents SSA from verifying individuals' eligibility and making an accurate and timely decision for their benefits. SSA collects this information on an as needed basis; therefore, 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 May 8, 2015, at 80 FR 26605, and we received no public comments. SSA published the second Notice on July 7, 2015, at 80 FR 38795. 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 Reporting Burden**  
 Below we provide annual burden estimates for information collection.

<b>Modality of Completion</b>	<b>Number of Respondents</b>	<b>Frequency of Response</b>	<b>Average Burden Per Response (minutes)</b>	<b>Estimated Annual Burden (hours)</b>
Paper SSA-8510 for Medicare Subsidy Quality Review	3,500	1	5	292
Paper SSA-8510 for general evidence purposes	19,800	1	5	1650
MSSICS	140,145	1	5	11, 679
<b>Totals</b>	<b>163,445</b>			<b>13,621</b>

Accordingly, the burden is **13,621** 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 Governments is approximately \$1,281. This amount reflects the dollar amount for printing and distributing the collection instrument in FY 2014. It also includes an estimate for the SSA employees to process the requests.
- 15. Program Changes or Adjustments to the Information Collection Request**  
 This form is currently in use under OMB Number 0960-0707 under which we only

reported the Medicare Part D usage; therefore, our estimate for general purposes is in use without an OMB number. Since we are currently reporting the expanded usage for general purposes, which increases the public burden, we are also requesting a new OMB number as our information collection for 0960-0707 covers only Medicare, and we currently use this form for other SSA programs as well (as indicated in #2 above). In addition, we are also including a new electronic version of the SSA-8510 in MSSICS, which also changes the total burden. See Addendum for further details.

**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.