Supporting Statement for Internet Direct Deposit Application 31 CFR 210 OMB No. 0960-0634

A. Justification

1. Introduction/Authoring Laws and Regulations

Recipients of Social Security benefits may choose to receive their payments through the Direct Deposit Program, in which the benefits payments go directly to accounts of beneficiaries at financial institutions (FI). To route benefit payments to the account at the FI, two key pieces of information are necessary: the depositor's account number, and the routing transit number of the receiving FI. The Treasury, Federal Reserve System, and the FI use this information to route payment to the beneficiary's account. Under the authority of *31 CFR 210*, *5 USC 301*, and *12 USC 391*, the Social Security Administration (SSA) collects this information through the Internet Direct Deposit Application.

2. **Description of Collection**

SSA requires all applicants and recipients of Social Security Old Age, Survivors, and Disability Insurance (OASDI) benefits, or Supplemental Security Income (SSI) payments to receive their benefits and payments via direct deposit at a financial institution. SSA receives Direct Deposit/Electronic Funds Transfer (DD/EFT) enrollment information from OASDI beneficiaries and SSI recipients to facilitate DD/EFT of their funds with their chosen financial institution. We also use this information when an enrolled individual wishes to change their DD/EFT information. For the convenience of the respondents, we collect this information through several modalities, including an Internet application, and in-office or telephone interviews. In Fiscal Year (FY) 2013, SSA retired the Direct Deposit automated telephone application aside. Callers, who contact the National 800 Number Network (N8NN) to start, change, or cancel direct deposit of their SSA payment, have their call automatically routed to the next available agent for assistance. In addition to using the direct deposit information to enable DD/EFT of funds to the recipients' chosen financial institution, we also use the information through our Direct Deposit Fraud Indicator to ensure the correct recipient receives the funds. Respondents are OASDI beneficiaries and SSI recipients requesting enrollment in the Direct Deposit program, or changes to their direct deposit banking information.

3. Use of Information Technology to Collect the Information

In accordance with the agency's Government Paperwork Elimination Act plan, SSA created an Internet, Intranet, and automated version for the Internet Direct Deposit Application. Based on our data, we estimate approximately 100% of respondents under this OMB number use an electronic version.

4. Why We Cannot Use Duplicate Information

The nature of the information we collect and the manner in which we collect 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 we did not use the Direct Deposit Application, SSA would not be able to enroll beneficiaries wishing to participate in the Direct Deposit Program. This would be an inconvenience to the beneficiary, and cost the Agency time and money since we would have to print and mail out checks to the beneficiaries. Because we only collect the information on an as needed basis, 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**SSA published the 60-day advance Federal Register Notice on December 30, 2015 at 80 FR 81664, and we received no public comments. We published the second Notice on March 1, 2016, at 81 FR 10699. If we receive any comments in response to the 30-day Notice, we will forward them to OMB. We did not consult with the public in the maintenance of this form.

9. Payment or Gifts to Respondents

SSA does not provide payment 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

Modality of Completion	Number of Respondents	Frequency of Response	Average Burden Per Response (minutes)	Estimated Annual Burden (hours)
Internet DD	507,214	1	10	84,536
Non-Electronic Services (FO, 800#-ePath, MSSICS, SPS, MACADE, POS, RPS)	3,317,351	1	12	663,470
Direct Deposit Fraud Indicator	54,016	1	2	1,801
Totals	3,878,581			749,807

The total burden for this ICR is **749,807** 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 estimated cost to the Federal Government to collect the information is negligible. Because the cost of maintaining the system which collects this information is accounted for within the cost of maintaining all of SSA's automated systems, it is not possible to calculate the cost associated with just one Internet application.

15. Program Changes or Adjustments to the Information Collection Request

The significant decrease in the burden information is due to both the termination of the automated direct deposit service to callers reaching the field offices and N8NN, as well as the agency initiative to move respondents away from direct mail and sign them up for direct deposit (see the Addendum for more information).

16. Plans for Publication Information Collection Results

SSA will not publish the results of the information collection.

17. Displaying the OMB Approval Expiration Date

SSA is not requesting an exemption to displaying the OMB expiration date on the Internet screens.

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).

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SSA does not use statistical methods for this information collection.