

**Supporting Statement for the SSA-1199-(Country)
International Direct Deposit
31 CFR 210
OMB No. 0960-0686**

A. Justification

1. Introduction/Authoring Laws and Regulations

The Social Security Act, section 205(a), authorizes the Social Security Administration (SSA) to use Form SSA-1199-(Country) to gather information for directly depositing benefit payments into a beneficiary's account at a financial institution outside the United States. Although the form contains the same generic information for all countries, the bank data varies slightly for each country. Therefore, we gear the form to each specific country for which International Direct Deposit (IDD) is available. We name each form according to the country, such as "SSA-1199-Canada." Each form always contains the same basic request for information. Currently IDD is available in 75 countries. We are working with the U.S. Department of the Treasury to expand IDD to other countries in compliance with Treasury's All-Electronic Payment Initiative. The only authorization SSA needs for countries participating in IDD is permission from the beneficiary to allow SSA to deposit their monthly payments electronically into the bank. Attached to this request, as a supplementary document, is a list of the countries and languages, as well as the variable information we may request on the form.

2. Description of Collection

SSA uses Form SSA-1199-(Country) to obtain the direct deposit information for foreign accounts, and enroll Title II beneficiaries residing abroad in IDD. Routing account number information varies slightly for each foreign country, so for each country we use our own variation of the Treasury Department's Form SF-1199A, used to enroll a beneficiary in direct deposit to a U.S. financial institution. Although SSA does not require the use of a form to sign up for direct deposit either in the U.S. or abroad, we use Form SSA-1199-(Country) to notify all check receivers in a given country that IDD is available. The beneficiary mails the completed form to the SSA office listed on the form. Currently, 58% of our foreign payments are IDD. As a result, there are over 75 versions of the SSA-1199-(Country) form (some countries have two versions each – their native language and English). For the purposes of this clearance, we are attaching a copy of a model form, SSA-1199-(Country), to illustrate the basic information we collect. The respondents are Social Security beneficiaries residing abroad who want SSA to deposit their Title II benefit payments directly to a foreign financial institution.

3. Use of Information Technology to Collect the Information

Form SSA-1199-(Country) is not currently available electronically. Legally mandated collections, which are electronic and higher volume, take precedence at this time. However, the form is currently available as a PDF on the InForm website and on PolicyNet. A respondent requests the form from SSA, an Embassy, Boarder Field Office, or the Federal Benefits Unit. The respondent fills out a portion of the form and has their financial institution fill out a portion. Then the respondent can mail the form back to

SSA, the Embassy, the Boarder Field Office, or the Federal Benefits Unit for processing. We also offer beneficiaries the option of enrolling in IDD through Quick\$start which we cleared under a separate OMB control number (0960-0564), and we recently added the IDD questions to SSA's iClaim Internet Social Security Benefit Application (0960-0618). However, our current research shows users of the iClaim IDD process continue to use the paper Form SSA-1199-(Country) to aid them while filling out the iClaim Internet screens. Therefore, until further developments with the electronic IDD process to make it easier for Internet users to complete the iClaim screens without the assistance of the paper form, we will continue to provide the paper form for use in tandem with iClaim IDD responses.

4. **Why We Cannot Use Duplicate Information**

The nature of the information we collect and the manner in which we collect it precludes duplication. SSA does not use another collection instrument to obtain similar data.

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 SSA did not collect this information, we would be unable to offer a direct deposit option to beneficiaries living abroad. Since the collection of this information is voluntary, we cannot collect it less frequently. There are no legal or technical 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**

The 60-day advance Federal Register Notice published on November 19, 2015, at 80 FR 72468, and we received no public comments. The 30-day FRN published on February 8, 2016 at 81 FR 6568. If we receive any comments in response to this Notice, we will forward them to OMB. SSA did not consult with the public in the revision of this form.

9. **Payment of Gifts to Respondents**

SSA provides no 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**

Approximately 12,500 respondents take 5 minutes per request to complete this form per year. Accordingly, the burden is 1,041 hours.

Modality of Completion	Number of Respondents	Frequency of Response	Average Burden Per Response (minutes)	Estimated Total Annual Burden (hours)
SSA-1199-(Country)	12,500	1	5	1,042

This figure represents burden hours, and we did not calculate a separate cost burden.

13. **Annual Cost to the Respondents**

There is no known cost burden to the respondents.

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

The annual cost to the Federal Government to process this form is approximately \$60,000. This represents the actual time it takes SSA employees to collect and input the data. This includes inputting data from a paper application mailed into the processing component. There is no cost to the Federal Government for us to report since the cost is absorbed in each individual component's budget for printer ink when downloading and printing the form from PolicyNet or the InForm website.

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

The increase in burden stems from an increase in respondents. This change is due to an increase of participation in SSA's International Direct Deposit benefit payment option, which increases the public reporting burden accordingly.

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 exception to the requirement to display the OMB approval expiration date.

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. **Collections of Information Employing Statistical Methods**

SSA does not use statistical methods for this information collection.