

Supporting Statement for Form SSA-1699
Registration for Appointment Representative Services and Direct Payment
OMB No. 0960-0732

A. Justification

1. Introduction/Authorizing Laws and Regulations

If individuals want to become official representatives for Social Security claimants, the Social Security Administration (SSA) requires collection of certain information to register or appoint them as representatives. SSA uses Form SSA-1699, Registration for Appointed Representative Services and Direct Payment, for this purpose. Sections 206(a) and 1631(d) of the *Social Security Act* give SSA the authority to collect the information requested by Form SSA-1699.

2. Description of Collection

SSA uses Form SSA-1699 to register appointed representatives of claimants before SSA who:

- Want to register for direct payment of fees;
- Registered for direct payment of fees prior to 10/31/09, but need to update their information;
- Registered as appointed representatives on or after 10/31/09, but need to update their information; or
- Received a notice from SSA instructing them to complete this form.

By registering these individuals, SSA: (1) authenticates and authorizes them to do business with us; (2) allows them to access our records for the claimants they represent; (3) facilitates direct payment of authorized fees to appointed representatives; and, (4) collects the information we need to meet Internal Revenue Service (IRS) requirements to issue specific IRS forms if we pay an appointed representative in excess of a specific amount (\$600). The respondents are appointed representatives who want to use Form SSA-1699 for any of the purposes cited above.

3. Use of Information Technology to Collect the Information

We instruct all attorneys or non-attorneys eligible for direct payment to access the Appointed Representative Services at www.socialsecurity.gov/ar to complete and print the PDF document of the SSA-1699. Upon completion of the form, we instruct representatives to fax the completed form to (877) 268-3827. After submittal, a specialized unit of technicians processes the registration information. Once the technician completes the registration, they mail a notice of confirmation along with a USER and REP ID to the representative. Representatives are eligible for direct payment of authorized fees as long as they complete this one-time registration. If at any time a representative must update their registration information, i.e., representative's name, address, SSN, business affiliation, tax address...etc., they must resubmit a new SSA-1699.

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 gather similar data.

5. Minimizing Burden on Small Respondents

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

6. Consequences of Not Collecting Information or Collecting it Less Frequently

If we did not collect this information, SSA would have no means of authenticating representatives, allowing them direct access to beneficiary records, facilitating direct payment of authorized fees to representatives, or issuing the necessary IRS forms. Since we will only collect the information on an as-needed basis, we cannot conduct the information collection 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 February 8, 2016, at 81 FR 6568, and we received no public comments. SSA published the second Notice on April 18, 2016, at 81 FR 22698. 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 (except for payment of authorized fees).

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 question of a sensitive nature.

12. Estimates of Public Reporting Burden

We estimate approximately 16,000 respondents take 20 minutes each to complete this form, for a total of 5,333 hours. 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 Federal Government

The annual cost to the Federal Government is approximately \$163,000. This estimate is a projection of the costs for SSA employees to process the faxed in PDF forms, which representatives access from our Internet site.

15. Program Changes or Adjustments to the Information Collection Request

The significant decrease in burden hours stems from a decrease in the estimated number of respondents. Because of an improved MI data source, we were able to update our estimation methodology resulting in the change in burden. We will continue to monitor the management information data, and will make future changes to the burden data as needed.

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.