Supporting Statement for Supplemental Security Income Telephone Wage Reporting and Supplemental Security Income Mobile Wage Reporting 20 CFR 416.701-732 OMB No. 0960-0715

A. Justification

1. Introduction/Authoring Laws and Regulations

Title II, Sections 205(a) and Title XVI, Section 1631(d) (1) of the Social Security Act (Act) authorizes the Commissioner of the Social Security Administration (SSA) to conduct quality review processes. Section 20 CFR 416.701- 416.732 of the Code of Federal Regulations require Supplemental Security Income (SSI) recipients to report changes such as, changes in income, resources, and living arrangements which could affect the receipt and amount of their SSI payments. Section 202 of the Social Security Protection Act (42 USC 902 note) requires SSA to issue receipts to SSI recipients, or their representatives, when they report wages.

The President's <u>Executive Order 13520</u> directs agencies to reduce payment errors and eliminate waste, fraud, and abuse in Federal programs; and to use every tool available to identify and subsequently reclaim the funds associated with improper payments.

2. Description of Collection

SSA requires SSI recipients to report changes, which could affect their eligibility for, and the amount of, their SSI payments, such as changes in income, resources, and living arrangements. SSA's SSI Telephone Wage Reporting (SSITWR) and SSI Mobile Wage Reporting (SSIMWR) enable SSI recipients to meet these requirements via an automated mechanism to report their monthly wages by telephone and mobile application, instead of contacting their local field offices.

The SSITWR allows callers to report their wages by speaking their responses through voice recognition technology, or by keying in responses using a telephone key pad. The SSIMWR allows recipients to report their wages trough the mobile wage reporting application on their smartphone. SSITWR and SSIMWR systems collect the same information and send it to SSA over secure channels. To ensure the security of the information provided, SSITWR and SSIMWR ask respondents to provide information SSA can compare against our records for authentication purposes. Once the system authenticates the identity of the respondents, they can report their wage data. The respondents are SSI recipients, deemors¹, or their representative payees².

¹ Note: Deemors are parents of minor children and spouses of an adult SSI recipient whose earned income SSA deems to belong to the recipient and, therefore, reduces the amount of SSI payment

² Note: A representative payee is the person, agency, organization, or institution selected to receive and manage

3. Use of Information Technology to Collect the Information

The SSITWR system collects and transmits data electronically using telephone keypad entry and voice recognition technology. We instruct SSI recipients, deemors and representative payees (i.e., users/respondents) reporting monthly wages using SSITWR to call an SSA toll-free telephone number allowing them to either speak their responses (voice recognition technology), or key in the information using the touchtone telephone keypad. With SSIMWR, users access the mobile wage reporting application on their mobile device and key in the information required for both authentication and for entering wages. SSITWR and SSIMWR systems collect the same information and send it to SSA over secure channels.

In accordance with the agency's Government Paperwork Elimination Act plan, SSA created the electronic versions of SSITWR and SSIMWR. Based on our data, we estimate approximately 100% of respondents under this OMB number use the electronic version.

4. Why We Cannot Use Duplicate Information

Form SSA-8150-EV (OMB. No. 0960-0128) is a one-page reporting form that collects some of the same information as that included in this information collection. We use the form to remind individuals of the events they need to report and explain why reporting these events is important. We collect the information only once, either by telephone, or on the SSA-8150. Individuals use this form to report changes in writing. We authenticate respondents through telephone speech technology authentication through OMB No. 0960-0596.

SSA also collects information from other sources, such as public and private institutions, employers, and via computer matches with Federal and State agencies. However, to issue SSI payment amounts correctly, in a timely manner, and to prevent potential overpayments, SSA depends primarily on individuals, deemors, and their representative payees to report changes in circumstances when they occur.

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 we did not collect this information, or collect it in a timely fashion, improper wages would continue to be a leading cause of improper payments in the SSI program. There are no technical or legal obstacles to burden reduction.

7. Special Circumstances

There are no special circumstances that would cause SSA to conduct these

payments on behalf of an incapable SSI recipient. This includes a parent who is receiving payments on behalf of a minor.

information collections 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 18, 2016, at 81 FR 8323, and we received no public comments. The 30-day FRN published on April 25, 2016 at 81 FR 24155. If we receive any comments in response to this Notice, we will forward them to OMB. We did not consult with the maintenance of this application.

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 we collect 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.

Modality of Completion	Number of Respondents Using each Version	Frequency of Response	Response Time (minutes)	Burden (hours)
Training/	79,000	1	35	46,083
Instruction*				
SSITWR	37,000	12	5	37,000
SSIMWR	42,000	12	3	25,200
Totals	79,000			108,283

12. Estimates of Public Reporting Burden

*Note: The same 79,000 respondents are completing training and a modality of collection, therefore the actual total number of respondents is still 79,000

The total burden for this ICR is 108,283 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 to the respondents.

14. Annual Cost To Federal Government

The annual cost to the Federal Government is approximately \$400,000. This estimate is a projection of the costs for collecting the information.

15. Program Changes or Adjustments to the Information Collection Request

There are changes to the public reporting burden. This change stems from SSA basing prior figures on projected users due to the introduction of the SSIMWR pilot. Since then, the SSIMWR application is now in production. These new

figures reflect the actual user data of both the SSITWR system and the SSIMWR application.

16. Plans for Publication Information Collection Results

SSA will not publish the results of the information collections.

17. Displaying the OMB Expiration Date

SSA is not requesting an exception to the requirement to display the OMB 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. <u>Collection of Information Employing Statistical Methods</u>

SSA does not use statistical methods for these information collections.