Supporting Statement for the SSA-623, SSA-6230, SSA-6234, and iRPA (Internet Representative Payee Accounting)
Representative Payee Report (for Adult and Child Beneficiaries and for Organizational Representative Payees)
20 CFR 404.635, 404.2035, 404.2065, and 416.665
OMB No. 0960-0068

### A. Justification

# 1. Introduction/Authoring Laws and Regulations

In certain cases, the Social Security Administration (SSA) determines it is not in beneficiaries' best interest to receive their benefit payments directly. Section 1631(a) of the Social Security Act (Act) and Sections 20 CFR 404.635, 404.2035, 404.2065, and 416.665 of the Code of Federal Regulations state that, in such cases, we can designate a representative payee to act on behalf of beneficiaries.

# 2. Description of Collection

When SSA determines it is not in an Old Age Survivors and Disability Insurance (OASDI), or Supplemental Security Income (SSI) recipient's best interest to receive Social Security payments directly, the agency will designate a representative payee for the recipient. The representative payee can be: (1) a family member; (2) a non-family member who is a private citizen and is acquainted with the beneficiary; (3) an organization; (4) a state or local government agency; or (5) a business. In the capacity of representative payee, the person or organization receives the SSA recipient's payment directly, and manages these payments.

As part of its stewardship mandate, SSA must ensure the representative payees are properly using the payments they receive for the recipients they represent. The agency annually collects the information necessary to make this assessment using the SSA-623, Representative Payee Report-Adult; SSA-6230, Representative Payee Report-Child; SSA-6234, Representative Payee Report-Organizational Representative Payees; and through the electronic Internet application, Internet Representative Payee Accounting (iRPA). The respondents are representative payees of OASDI and SSI recipients.

# 3. Use of Information Technology to Collect the Information

In accordance with the agency's Government Paperwork Elimination Act plan, SSA created the iRPA, an Internet version of Forms SSA-623, SSA-6230, and SSA-6234. Based on our data, we estimate approximately 10% of respondents under this OMB number use the 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 affect small businesses or other small entities.

6. Consequence of Not Collecting Information or Collecting it Less Frequently If we did not collect the information on Forms SSA-623, SSA-6230, SSA-6234, and the iRPA, we would not be able to ensure the representative payees use the money they receive from us for the beneficiary's benefit. Since we only collect information annually to reflect the past year's use of SSA payments, we cannot collect it less frequently.

# 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 March 7, 2017, at 82 FR 12878, and we received no public comments. The 30-day FRN published on May 12, 2017 at 82 FR 22173. If we receive any comments in response to this

Notice, we will forward them to OMB.

# 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

Modality of Completion	Number of Respondents	Frequency of Response	Average Burden Per Response (minutes)	Estimated Total Annual Burden (hours)
SSA-623	2,812,662	1	15	703,166
SSA-6230	2,968,986	1	15	742,247
SSA-6234	719,684	1	15	179,921
iRPA*	650,195	1	15	162,549
Totals	7,151,527			1,787,883

<sup>\*</sup>One Internet platform encompasses all three paper forms

The total burden for this ICR is 1,787,883 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 Government for this collection is approximately \$32,800,000. This estimate accounts for costs from the following areas: (1) designing, printing, and distributing the form; (2) SSA employee (e.g., field office, 800 number, DDS staff) information collection and processing time; and (3) systems development, updating, and maintenance costs.

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

The increase in burden hours stems from an increase in the number of respondents completing the paper forms and the iRPA screens.

#### 16. Plans for Publication Information Collection Results

SSA will not publish the results of the information collection.

### 17. Displaying the OMB Approval Expiration Date

For the paper forms, 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.

For the Internet version, iRPA, SSA is not requesting an exception to the requirement to display the OMB approval expiration date.

# 1. 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.