

**Supporting Statement for
Authorization for the Social Security Administration to Obtain Wage and Employment
Information from Payroll Data Providers
Form SSA-8240
OMB No. 0960-NEW**

A. Justification

1. Introduction/Authoring Laws and Regulations

Section 824 of the *Bipartisan Budget Act (BBA) of 2015, P.L. 114-74* authorizes the Social Security Administration (SSA) to enter into information exchanges with payroll data providers, for the purposes of improving program administration and preventing improper payments of the Social Security Disability Insurance (SSDI) and Supplemental Security Income (SSI) programs. *42 U.S.C. 1320e 3(c) (1)* of the *U.S. Code* defines information exchanges as the automated comparison of our systems of records with records of payroll data providers. *42 U.S.C. 425(c) and 1383(e)(1)(B)(iii)* authorize SSA to require each individual applying for, or receiving, SSDI and SSI benefits to provide authorization to obtain any record about the individual held by the payroll data provider whenever SSA determines we need the record in connection with a determination of initial or continuing entitlement to benefits.

2. Description of Collection

As part of the disability claim process, SSA will use Form SSA-8240, Authorization for the Social Security Administration to Obtain Wage and Employment Information from Payroll Data Providers, to secure the authorization needed from the relevant members of the public to obtain their wage and employment information from payroll data providers. Ultimately, SSA will use this wage and employment information to help determine program eligibility and payment amounts. The public will be able to complete Form SSA-8240 using the following modalities: a paper form; the Internet; and an in-office or telephone interview during which an SSA employee will document the wage and employment information authorization on one of SSA's internal systems: the Modernized Claims System (MCS); the Modernized Supplemental Security Income Claims System (MSSICS); eWork; or iMain. The individual's authorization will remain effective until one of the following four events occurs:

- SSA makes a final adverse decision on the application for benefits, and the applicant filed no other claims or appeals under the Title for which SSA obtained the authorization;
- the individual's eligibility for payments ends, and the individual filed no other claims or appeals under the Title for which SSA obtained the authorization;
- the individual revokes the authorization verbally or in writing; or
- the deeming relationship ends (for SSI purposes only).

Should authorization end due to one of the above events; if necessary at a latter point, the respondent will need to complete Form SSA-8240 again.

SSA will request authorization on an as-needed basis as part of the following processes: (a) SSDI and SSI initial claims; (b) SSI redeterminations; and (c) SSDI Work Continuing Disability Reviews. The respondents are individuals who file for, or are currently receiving, SSDI or SSI payments, and any person whose income and resources SSA counts when determining an individual's SSI eligibility or payment amount. Normally we would clear this under iClaim (0960-0618), however; as iClaim is currently undergoing enhancements which require OMB approval, we are clearing it here, and will later transfer burden hours to iClaim.

3. Use of Information Technology to Collect the Information

Form SSA-8240 is available on SSA's Intranet website for SSA employees to print and mail to the public. The public may also complete the form via the Internet. SSA employees complete the electronic version of Form SSA-8240 via an in-office, or telephone interview during which the SSA employee enters the information on the *wage and employment information authorization* screens which SSA staff can access through MCS, MSSICS, eWork or iMain. In accordance with the agency's Government Paperwork Elimination Act plan, SSA created an Internet version of Form SSA-8240. Based on its data, SSA estimates approximately 98% 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 precludes duplication. SSA does not use another collection instrument to collect 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 does not use Form SSA-8240 to collect authorization, we will not be able to obtain wage and employment information directly from payroll data providers on a monthly basis via the information exchange. This will prevent SSA from using an automated process to verify wage and employment information, and create a higher risk of incorrect eligibility determinations, and incorrect payment of benefits for individuals, provided by payroll data providers to SSA. Because we collect this 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

The 60-day advance Federal Register Notice published on March 15, 2017 at 82 FR 13913, and we received no public comments. The 30-day FRN published on May 23, 2017 at 82 FR 23695. 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-8240 (paper)	136,150	1	6	13,615
Title II & Title XVI Electronic (MCS, MSSICS, and eWork)	2,769,800	1	2	92,327
Internet	927,504	1	2	30,917
Revoking Authorization	191,673	1	10	31,946
Totals	4,025,127			168,805

The total burden for this ICR is 168,805 hours. This figure represents burden hours, and we did not calculate a separate cost burden. We estimated the number of respondents and response time based on new claims and CDRs per year (the respondents from whom we will need to obtain authorization).

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 is approximately \$8,410,803. 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, etc.) information collection and processing time; and (3) systems development, updating, and maintenance costs.

15. **Program Changes or Adjustments to the Information Collection Request**
This is a new form, which increases the public reporting burden. See #12 above for updated burden figures.

16. **Plans for Publication Information Collection Results**
SSA will not publish the results of the information collection.

17. **Displaying the OMB Approval Expiration Date**
Paper SSA-8420

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.

Internet

For the Internet version of Form SSA-8240, SSA is not requesting an exception to the requirement to display the OMB approval expiration date.

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.