

**Supporting Statement for
RSI/DI Quality Review Case Analysis - Sampled Number Holder; Auxiliaries/Survivors;
Parent; Stewardship Annual Earnings Test
OMB: 0960-0189**

A. Justification

1. Introduction/Authorizing Laws and Regulations

Section 205(a) of the *Social Security Act (Act)* authorizes the Commissioner of the Social Security Administration (SSA) to conduct the quality review process, which entails collecting information related to the accuracy of payments made under the Old-Age, Survivors, and Disability Insurance Program (OASDI). Sections 228(a)(3), 1614(a)(1)(B), and 1836(2) of the *Act* require a determination of the citizenship or alien status of the beneficiary; this is only one item that we might question as part of the Annual Quality review.

2. Description of Collection

SSA uses Forms SSA-2930, SSA-2931, and SSA-2932 to establish a national payment accuracy rate for all cases in payment status, and to serve as a source of information regarding problem areas in the Retirement Survivors Insurance (RSI) and Disability Insurance (DI) programs. We also use the information to measure the accuracy rate for newly adjudicated RSI or DI cases. SSA uses Form SSA-4659 to evaluate the effectiveness of the annual earnings test, and to use the results in developing ongoing improvements in the process. About twenty-five percent of respondents have in-person reviews and receive one of the following appointment letters: (1) SSA-L8550-U3 (Appointment Letter – Sample Individual); (2) SSA-L8551-U3 (Appointment Letter – Sample Family); or (3) the SSA-L8552-U3 (Appointment Letter – Rep Payee). Seventy-five percent of respondents receive a notice for a telephone review using the SSA-L8553-U3 (Beneficiary Telephone Contact), or the SSA-L8554-U3 (Rep Payee Telephone Contact). To help the beneficiary prepare for the interview, we include three forms with each notice: (1) SSA-85 (Information Needed to Review Your Social Security Claim), which lists the information the beneficiary will need to gather for the interview; (2) SSA-2935 (Authorization to the Social Security Administration to Obtain Personal Information), which verifies the beneficiary's correct payment amount, if necessary; and (3) SSA-8552 (Interview Confirmation), which confirms or reschedules the interview if necessary. The respondents are a statistically valid sample of all OASDI beneficiaries in current pay status or their representative payees.

3. Use of Information Technology to Collect the Information

While these forms are available as PDF versions on the SSA website, beneficiaries never fill out the forms directly. We collect all of the information on these forms through telephone interviews with the beneficiaries. The SSA employee conducting the interview writes down the answers to the questions directly on the paper form for the telephone

interviews. SSA did not create an electronic version of these forms under the agency's Government Paperwork Elimination Act (GPEA) plan because only 17,700 respondents complete the form. This is less than the GPEA cut-off of 50,000.

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 use these forms, SSA would have no way to effectively evaluate and recommend ongoing improvements for the OASDI program. In addition, if we did not collect this information, it would result in insufficient coverage; we would lose data on the effects of policy and program changes; and users of this data (including Congress; SSA; other Federal agencies; the media; and the general public) would have to plan without firm knowledge of program characteristics. Because we only collect the 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 28, 2017, at 82 FR 15412, and we received no public comments. The 30-day FRN published on July 13, 2017 at 82 FR 32431. 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

The following burden chart shows the estimated annual burden information for each of the information collection instruments we use as part of the RSI/DI Quality Review Case Analysis. We based these figures on our current management information data:

Modality of Completion	Number of Respondents	Frequency of Response	Average Burden per Response (minutes)	Estimated Total Annual Burden (hours)
SSA-2930	1,500	1	30	750
SSA-2931	850	1	30	425
SSA-4659	325	1	10	54
SSA-L8550-U3	385	1	5	32
SSA-L8551-U3	95	1	5	8
SSA-L8552-U3	35	1	5	3
SSA-L8553-U3	4,970	1	5	414
SSA-L8554-U3	705	1	5	59
SSA-8552	2,350	1	5	196
SSA-85	3,850	1	5	321
SSA-2935	2,350	1	5	196
SSA-8510 (also saved under OMB No. 0960-0707)	800	1	5	67
Totals	18,215			2,525

The total burden for this ICR is **2,525** 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 is approximately \$3,317. This estimate accounts for costs from the following areas: (1) designing, printing, and distributing the form; and (2) SSA employee information collection and processing time.

15. Program Changes or Adjustments to the Information Collection Request

The overall decrease in burden hours stems from the discontinuation of the work activity reports continuing disability review information (SSA-820 and SSA-821) as part of the study in FY 2016. In addition, we already account for any use of those forms under their own OMB Control Numbers, 0960-0059 (SSA-821), and 0960-0598 (SSA-820), so we no longer account for them here. In addition, we also show a minor increase in use for

both the SSA-L8553-U3, and SSA-L8554-U3. This increase is due to an increase in the use of our telephone review letters, and is part of the normal fluctuation in use we see in our management information data.

16. Plans for Publication Information Collection Results

SSA's Office of Quality Review prepares and publishes the results of this information collection. See Part B for more information.

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).