Supporting Statement for Form SSA-4588 and One-Time Payment Electronic Application You Can Make Your Payment by Credit Card OMB Control No. 0960-0462

A. <u>Justification</u>

1. Introduction/Authoring Laws and Regulations

SSA participates in the Card Acquiring Service, formerly referred to as the Plastic Card Network, headed by the U.S. Department of Treasury. The objective of the service is to increase electronic collections received by the Government, and process these transactions in an efficient, timely, and cost-effective manner. Sections 204(a)(1) and 1631(b)(1) of the Social Security Act give the Commissioner of the Social Security Administration (SSA) the authority to recover payments from overpaid individuals collecting Title II benefits and Title XVI payments.

2. **Description of Collection**

SSA uses the information we collect on Form SSA-4588, and its electronic application, SSA-4589, to update individuals' Social Security records to reflect payments made on their overpayments. In addition, SSA uses this information to process payments through the appropriate credit card company. SSA provides a copy of the SSA-4588 when we inform an individual that we detected an overpayment. Individuals may choose to make a one-time payment, or recurring monthly payments, when they complete and submit the SSA-4588. When individuals choose to telephone the Program Service Centers to make a one-time payment in lieu of completing Form SSA-4588, an SSA debtor contact representative completes the SSA-4589 electronic Intranet application. SSA employees, who take the telephone calls from individuals making a one-time credit card payment, enter credit card information directly into an electronic intranet application. Individuals wishing to establish recurring monthly payments must still complete the SSA-4588 paper form due to the original signature requirement. Respondents are Old Age Survivors and Disability Insurance (OASDI) beneficiaries and Supplemental Security Income (SSI) recipients who have outstanding overpayments

3. Use of Information Technology to Collect the Information

SSA did not create an electronic version of the SSA-4588 under the agency's Government Paperwork Elimination Act (GPEA) plan because we require an original wet signature to establish recurring credit card payments. SSA keeps the signature on file as proof that the individual requested SSA to charge a specific credit card on a recurring monthly basis. The form requires special technology to process the sensitive financial information, which the form collects. The debtor completes the form and sends it to the appropriate PSC.

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

If we did not use Form SSA-4588 and the telephone one-time credit card payment collection (SSA-4589) to collect this information, the agency would not be able to participate in the Card Acquiring Service, and, therefore, could not process credit card payments from overpaid Title II and Title XVI recipients. Because we only collect the information on an as needed basis, we cannot collect it less frequently. There are no technical or legal obstacles that prevent 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

SSA published the 60-day advance Federal Register Notice on October 26, 2017 at 82 FR 49694, and SSA received no public comments. We published the 30-day advance Federal Register Notice on January 12, 2018 at 83 FR 1651. If we receive any public comments regarding the 30-day Notice, we will forward them to OMB. SSA had no outside consultations with members of the public.

9. **Payment of 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.

Modality of Number of Frequency Average Estimated Completion **Respondents** of **Burden Per** Total Response Response Annual (minutes) Burden (hours) SSA-4588 16,500 1 10 2750 SSA-4589 258,500 1 5 21542 (Electronic (intranet) Application Total 275,000 24,292

12. Estimates of Public Reporting Burden

The total burden for this ICR is **24,292 hours**. We based these figures on current management information data. This figure represents burden hours, and we did not calculate a separate cost burden.

13. **Cost to Respondents**

There is no known cost burden to the respondents.

14. Annual Cost to the Federal Government

The annual cost to the Federal Government is approximately \$400,000. This figure represents estimated accounts for costs from the following areas: (1) designing, printing, and distributing the form; (2) SSA employee information collection and processing time; and (3) systems maintenance costs.

15. **Program Changes or Adjustments to the Information Collection**

The increase in burden hours stems from an increase in respondents who are more familiar with paying debts via credit card, and more debtors choosing to make recurring monthly credit card payments.

16. Plans for Publication Information Collection Results

SSA will not publish the results of the information collection.

17. **Displaying the OMB 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. 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>Statistical Methods</u>

SSA does not use statistical methods for this information collection.