

Supporting Statement for Form SSA-8510
Authorization for the Social Security Administration to Obtain Personal Information
20 CFR 404.704; 404.820 - 404.823; 404.1926; 416.203; and 418.3001
OMB No. 0960-0801

A. Justification

1. Introduction/Authoring Laws and Regulations

The Social Security Administration (SSA) has authority to establish the necessary provisions to obtain proofs and evidence regarding eligibility for Social Security programs. Under Title II and Title XVI of the *Social Security Act (Act)*, SSA determines eligibility and entitlement to our programs through the collection of the proof and evidence supporting the application for benefits as per Sections 205(a) and 1631(e) of the *Act*. In addition, Sections 20 CFR 404.704, 404.1926, 416.203, and 418.3001 of the *Code of Federal Regulations (Code)* explain the different requirements for providing evidence regarding eligibility for SSA programs, and sections 404.820-404.823 of the *Code* detail requirements of proof when individuals request changes to their SSA files.

2. Description of Collection

SSA uses Form SSA-8510 to contact a public or private custodian of records on behalf of an applicant or recipient of an SSA program to request evidence information, which may support a benefit application or payment continuation. We ask for information such as the following:

- Age (e.g. birth certificate, court documents)
- Insured status (e.g. earnings, employer verification)
- Marriage or divorce
- Pension Offsets
- Wages verification
- Annuities
- Property information
- Benefit verification from a State agency or third party
- Immigration status (rare instances)
- Income verification from public agencies or private individuals
- Unemployment benefits
- Insurance Policies

If the custodian of the records requires a signed authorization from the individual(s) whose information SSA requests, SSA may provide the custodian with a copy of the SSA-8510. Once the respondent completes the SSA-8510, either using the paper form, or using the Personal Information Authorization Intranet version, SSA uses the form as the authorization to obtain personal information regarding the respondent from third parties until the authorizing person (respondent) revokes the permission of its usage. The collection is voluntary; however, failure to verify the individuals' eligibility can prevent SSA from making an accurate and timely decision for their benefits. The respondents are individuals who may file

for, or currently receive, Social Security benefits, SSI payments, or Medicare Part D subsidies.

3. **Use of Information Technology to Collect the Information**

In accordance with the agency's Government Paperwork Elimination Act plan, SSA created an Intranet version of Form SSA-8510, the Personal Information Authorization screens. Based on our data, we estimate approximately 80% 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 collect similar data. We use the SSA-8510 generic language form to request various types of information except for information from medical sources, which we collect using the SSA-827 (0960-0623), or information from financial institutions, which we collect using the SSA-4641 (0960-0293).

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 Form SSA-8510, we would be unable to verify an individual's eligibility, and unable to make an accurate and timely decision for benefits. 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 May 9, 2018, at 83 FR 21328, and we received no public comments. The 30-day FRN published on July 26, 2018 at 83 FR 35526. 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**

Below we provide annual burden estimates for information collection:

Modality of Completion	Number of Respondents	Frequency of Response	Average Burden Per Response (minutes)	Estimated Annual Burden (hours)
Paper SSA-8510 for general evidence purposes	19,800	1	5	1650
Personal Information Authorization Intranet Screens	140,145	1	5	11, 679
Totals	163,445			13,621

The total burden for this ICR is 13,621 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. **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 \$1,281. 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. **Plans for Publication Information Collection Results**

SSA will not publish the results of the information collection.

16. **Displaying the OMB Approval Expiration Date**

Paper Forms SSA-8510

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.

Intranet –Based Applications:

SSA is not requesting an exception to the requirement to display the OMB approval expiration date.

17. **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.