**Justification for Non-Substantive Changes for iRPA (Internet Representative Payee Accounting) screens**

**20 CFR 404.635, 404.2035, 404.2065, and 416.665**

**OMB No. 0960-0068**

**Background**

On April 13, 2018, the President signed Public Law No. 116-165, The Strengthening Protections for Social Security Beneficiaries Act of 2018. Section 102, Reducing the burden on families, changes SSA's annual accounting reporting requirements for certain representative payees. SSA no longer require certain representative payees to file a Representative Payee Report (SSA-623), accounts for the use of the Social Security benefits received on behalf of beneficiaries.

Effective April 13, 2018, the following representative payees stopped receiving a request to complete a Representative Payee Report:

* natural or adoptive parents of a minor child who reside in the same household;
* legal guardians of a minor child who reside in the same household;
* natural or adoptive parents who reside in the same household with an adult child who has a disability; and
* spouses
* **Change #1:** We are reducing the number of respondents reporting on Forms:

SSA-623; SSA-6230; and SSA-6234, which will also reduce the estimated total annual burden (hours).

|  |  |  |  |  |
| --- | --- | --- | --- | --- |
| **Modality of Completion** | **Number of Respondents**  | **Frequency of Response** | **Average Burden Per Response (minutes)** | **Estimated Total Annual Burden (hours)** |
| SSA-623 | 2,155,574 | 1 | 15 | 538,894 |
| SSA-6230 | 1,549,356 | 1 | 15 | 387,339 |
| SSA-6234 | 566,072 | 1 | 15 | 141,518 |
| iRPA\* | 358,308 | 1 | 15 | 89,577 |
| MyRPA\*\* | 46,984 | 1 | 15 | 11,746 |
| **Totals** | **4,676,294** |  |  | **1,169,074** |

\*One Internet platform encompasses all three paper forms

\*\*One mobile platform encompasses all three-paper forms

* **Justification #1:** We are reducing the number of respondents, because we will no longer send certain Representative Payees Forms: SSA-623; SSA-6230; SSA-6234; iRPA, and MyRPA

**Change #2:** We are reducing the annual cost to the Federal Government from$ to $31,348,649. 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.

* **Justification:** We are reducing the annual cost, because we have fewer respondents who will be using the forms and online applications.