

Supporting Statement for Form SSA-8202-BK
Statement for Determining Continuing Eligibility for
Supplemental Security Income Payment
20 CFR 416.204
OMB No. 0960-0145

A. Justification

1. Introduction/Authoring Laws and Regulations

Title XVI, part A, Section 1611(c)(1) of the Social Security Act (Act) requires that the Commissioner of the Social Security Administration (SSA) shall redetermine eligibility for, and the amount of, Supplemental Security Income (SSI) payments. 20 CFR 416.204 of the Code of Federal Regulations provides that the SSA conduct redeterminations (RZ) periodically on a scheduled basis, or when we receive notification of a change that would affect an SSI recipient's continued eligibility or payment amount.

2. Description of Collection

SSA uses Form SSA-8202-BK to conduct low and middle-error profile (LEP/MEP) telephone, or face-to-face, RZ interviews with SSI recipients and representative payees, if applicable. SSA conducts LEP redeterminations interviews on a 6-year cycle, and MEP redeterminations annually. SSA requires the information we collect during the interview to determine whether: (1) SSI recipients met, and continue to meet, all statutory and regulatory requirements for SSI eligibility; and (2) SSI recipients received, and are still receiving, the correct payment amounts. This information includes non-medical eligibility factors such as income, resources, and living arrangements. To complete Form SSA-8202, the respondents may need to obtain information from employers or financial institutions. The respondents are SSI recipients and their representatives, if applicable.

3. Use of Information Technology to Collect the Information

SSA employees document the information gathered during the interview process through our SSI Claims System and its paper equivalent, Form SSA-8202-BK. In addition, SSA conducts electronic interfaces with records of other government entities whose records contain information that may affect a recipient's SSI eligibility or payment amount. We must verify any conflicting information we get through these interfaces with the recipient. Based on our data, we estimate approximately 95% of respondents under this OMB number use the electronic version.

4. Why We Cannot Use Duplicate Information

Form SSA-8203-BK (OMB Number 0960-0416) also collects information similar to that collected by Form SSA-8202-BK. However, Form SSA-8203-BK is a more comprehensive, and complex redetermination form used to conduct high-error profile (HEP) redeterminations. It is not a self-help form, and SSA field office personnel always complete it by conducting personal contact interviews through the

SSI Claims System. Form SSA-8202-BK is a simpler design, not intended for use in HEP redeterminations. Conducting LEP and MEP redeterminations using Form SSA-8203-BK instead of Form SSA-8202-BK creates an unnecessary burden on the recipients at a higher cost to the Federal government. Therefore, SSA does not use the two forms for the same purpose.

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-8202-BK during RZ interviews, potential eligibility or events affecting payment would go undetected. This can adversely affect recipients through underpayments (i.e., erroneously low SSI payments) or overpayments (excessive SSI payments which may result in collection activities). We perform MEP redeterminations annually. In addition, since SSA collects a majority of LEP on a 6-year cycle, we cannot collect it less frequently. Collecting these types of redeterminations less frequently would compromise program integrity. 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 January 25, 2019, at 84 FR 371, and we received no public comments. The 30-day FRN published on March 27, 2019, at 84 FR 11625. If we receive any comments in response to this Notice, we will forward them to OMB. SSA did not consult with the public in the revision of this form.

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-8202-BK	9,954	1	21	3,484
SSI Claims System	2,021,833	1	20	673,944
Totals	2,031,787			677,428

The total burden is **677,428**. We based this figure on current management information data, and it represents burden hours. We did not calculate a separate cost burden.

13. Annual Cost to the Respondents (Other)

This collection does not impose a known cost burden to the respondents.

14. Annual Cost To Federal Government

The annual cost to the Federal Government is approximately \$19,321,048. This estimate is a projection of costs for postage, envelopes, maintenance to the SSI Claims System, and SSA staff time.

15. Program Changes or Adjustments to the Information Collection Request

The decrease in burden hours from 766,807 to 677,428 hours is due to obtaining actual, updated Management Information provided for the respondents who completed the information collection via Form SSA-8202. In addition, the total volume of SSI recipients and SSI claims both reduced since the last renewal, causing an overall decrease in burden hours.

16. Plans for Publication Information Collection Results

SSA will not publish the results of the information collection.

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).

B. Collection of Information Employing Statistical Methods

SSA does not use statistical methods for this information collection.