

**Supporting Statement for Form SSA-624-F5  
Representative Payee Evaluation Report  
20 CFR 404.2065 and 416.665  
OMB No. 0960-0069**

**A. Justification**

**1. Introduction/Authoring Laws and Regulations**

Sections 205(j)(3) and 1631(a)(2)(c) of the *Social Security Act (Act)* state that the Social Security Administration (SSA) may authorize payment of Social Security benefits, or Supplemental Security Income payments, to a relative, another person, or an organization interested in, or concerned about, the welfare of the beneficiary or SSI recipient, when SSA determines it is not in the beneficiary's or SSI recipient's best interest to receive benefits directly. SSA calls these individuals and organizations representative payees. Sections 205(j)(3) and 1631(a)(2)(C) of the *Act* authorize SSA to monitor and verify (in certain situations) how the representative payees use such payments. SSA requires representative payees (except State mental institutions participating in SSA's triennial onsite review program) to report to SSA in writing at least once a year to explain how they used and conserved the funds they received. Sections 20 *CFR* 404.2065 and 416.665 of the *Code of Federal Regulations* authorizes SSA to collect periodic written reports from representative payees.

**2. Description of Collection**

SSA uses the Representative Payee Evaluation Report, Form SSA-624-F5, as a documentation tool for interviews with, and evaluations of, representative payees. SSA requires our field offices (FO) to conduct a face-to-face interview with the representative payee using Form SSA-624 when: (1) SSA finds the payee's responses on SSA-required annual accounting reports [Forms SSA-623, SSA-6230, and SSA-6234 (OMB No. 0960-0068)] unacceptable, and we cannot resolve them; (2) the payee fails to complete SSA's initial and second request for an annual accounting report; and, (3) assessing the representative payee's continued suitability. In addition to the representative payee, we also interview the beneficiary, or SSI recipient, and custodian (if other than the payee) to confirm information the payee provides, and to ensure the payee is meeting the beneficiary's or SSI recipient's current needs (face-to-face interview not required). The respondents are individuals or organizations serving as representative payees for individuals receiving Title II benefits, or Title XVI payments, who fail to comply with SSA's statutory annual reporting requirement.

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

FO's complete the paper Form SSA-624-F5 based on a face-to-face interview with the representative payee. The form is also available in a Fillable modality, which allows respondents to continue to print and complete the form by hand, but also allows them to complete the form on a computing device, print it, and submit it to SSA. SSA has not, yet, scheduled this form for electronic implementation

under the SSA Government Paperwork Elimination Act plan because higher volume forms take precedence. Once SSA converts our higher volume applications to electronic modalities, we can begin concentrating on those with lower volumes of respondents.

**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 may affect some small businesses or other small entities. We minimized the burden by carefully reviewing the form and ensuring we ask small businesses and small entities only relevant and necessary questions. We have also minimized the burden by incorporating “yes” and “no” responses where feasible.

**6. Consequence of Not Collecting Information or Collecting it Less Frequently**

SSA collects accounting information annually from representative payees. This statutory requirement is the result of a class action suit filed against SSA (*Jordan v. Bowen*), and therefore, we must collect the information. There is continued Congressional interest on SSA initiatives designed to improve the representative payment monitoring process. For these reasons, we cannot collect the information 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 22, 2019, at 84 FR 23623, and we received no public comments. The 30-day FRN published on August 1, 2019 at 84 FR 37704. 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**

SSA uses Form SSA-624-F5 annually for approximately 7,276 respondents. The estimated completion time is 30 minutes for a total burden of 3,638 hours. Based on SSA’s most recent data, we estimate the burden data as follows:

<b>Modality of Completion</b>	<b>Number of Respondents</b>	<b>Frequency of Response</b>	<b>Average Burden Per Response (minutes)</b>	<b>Estimated Total Annual Burden (hours)</b>
SSA-624-F5 – Individuals	6,956	1	30	3,478
SSA-624-F5 – State and Local Government	40	1	30	20
SSA-624-F5 – Businesses	280	1	30	140
<b>Totals</b>	<b>7,276</b>			<b>3,638</b>

The total burden for this ICR is **3,638** hours. We based these figures on current management information data, 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 to the respondents.

**14. Annual Cost To Federal Government**

The annual cost to the Federal Government is approximately \$92,514. This estimate accounts for costs from the following areas: (1) SSA employee (e.g., field office, 800 number, DDS staff) information collection and processing time; and (2) systems development, updating, and maintenance costs.

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

The decrease in the public reporting burden from 133,500 to 3,638 is due to legislative changes we are implementing because of Section 102 of the Strengthening Protections for Social Security Benefits Act of 2018 (Pub.L. 115-165). Section 102 of Pub.L. 115-165 exempts custodial parents of minor children and disabled individuals, as well as spouses, from annual payee accountings. Due to the provisions of this law, we expect a drastic reduction in the number of respondents for the form SSA-624-F5 because the majority of the previous respondents fall into one of the exemption categories under this new law.

**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. Collections of Information Employing Statistical Methods**

SSA does not use statistical methods for this information collection.