

Supporting Statement for Form SSA-8203-BK
Statement for Determining Continuing Eligibility for
Supplemental Security Income Payment
20 CFR 416.204
OMB No. 0960-0416

A. Justification

1. Introduction/Authoring Laws and Regulations

Title XVI, part A, Section 1611(c)(1) of the *Social Security Act (Act)* gives the Commissioner of the Social Security Administration (SSA) the authority to redetermine eligibility for, and the amount of, Supplemental Security Income (SSI) payments. Subpart B, 20 CFR 416.204, of the *Code of Federal Regulations* provides SSA with the authority to make SSI recipient eligibility redeterminations (RZ) periodically on a scheduled basis, or when a recipient informs SSA of a change that would affect the recipient's continued SSI eligibility or payment amount.

2. Description of Collection

To determine whether SSI recipients (1) have met, and continue to meet, all statutory and regulatory requirements for SSI eligibility, and (2) are receiving the correct SSI payment amount, SSA conducts redeterminations of disability. Periodic collection of this information using Form SSA-8203-BK is the only way SSA can make these redeterminations, and collect the information as mandatory under the law. We routinely collect the information in field offices via personal contact (face-to-face or telephone interview) using the automated SSI Claims System. The respondents are SSI recipients or their representative payees.

3. SSA's Use of Information Technology to Collect the Information

SSA employees document the information gathered during the interview process through the SSI Claims System and its paper equivalent Form SSA-8203-BK. In addition, we conduct electronic interfaces with records of other government entities whose records contain information that may affect a recipient's SSI eligibility or payment amount. SSA verifies any conflicting information we get through these sources with the SSI recipient. In accordance with the agency's Government Paperwork Elimination Act plan, SSA created the SSI Claims System version of Form SSA-8203-BK. Based on our data, we estimate approximately 90% of respondents under this OMB number use the electronic version.

4. Why We Cannot Use Duplicate Information

Some, but not all of the information SSA collects on Form SSA-8203-BK is also present on Form SSA-8202-BK. SSA uses Form SSA-8202-BK to conduct RZs on middle-error and low-error profile (MEP and LEP) RZ cases either during personal contact interviews conducted by SSA field office personnel (for MEPs), or as a self-help form the respondent completes without assistance from SSA employees (for LEPs). The SSA-8202-BK does not elicit enough information to make accurate determinations of continuing SSI eligibility and payment amounts in HEP RZ cases.

Therefore, we use the two forms for different purposes. There is no other similar information collection that SSA can use or modify for this 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-8203-BK, SSA would be unable to detect potential eligibility or events affecting payments, which can adversely affect recipients through underpayments (i.e., erroneously low benefit payments), or overpayments (excessive benefits payments which will result in collection activities). Because we collect the information on an as needed basis, we cannot collect it less frequently. There are no technical or legal obstacles preventing 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 June 4, 2019 at 84 FR 25891, and we received no public comments. The 30-day FRN published on August 7, 2019 at 84 FR 38714. If we receive any comments in response to this Notice, we will forward them to OMB. We 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-8203-BK - SSI Claims System	1,468,220	1	19	464,936
SSA-8203-BK –	135,357	1	20	45,119

Paper Version				
Totals	1,603,577			510,055

The total burden for this ICR is **510,055** 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 to the respondents.

14. Annual Cost To Federal Government

The annual cost to the Federal Government is approximately \$14,485,010. 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. Program Changes or Adjustments to the Information Collection Request

When we last cleared this IC in 2016, the burden was 523,418 hours. However, we are currently reporting a burden of 510,055 hours. This change stems from a decrease in the completion time from 20 minutes to 19 minutes. Because we no longer collect a wet s for the SSI Claims System, there is a decrease in completion time resulting in a change in burden.

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.