

Supporting Statement for Form SSA-8001-BK
Application for Supplemental Security Income
20 CFR 416.305 - 20 CFR 416.335, Subpart C
OMB No. 0960-0444

A. Justification

1. Introduction/Authoring Laws and Regulations

Section 1631(e)(1) of the *Social Security Act (Act)* requires the Commissioner of the Social Security Administration (SSA) to promulgate regulations concerning applications for Supplemental Security Income (SSI) payments. SSI is a Federal income supplement program funded by general tax revenues (not Social Security taxes). SSI provides aged, blind, and disabled people who have little or no income with the funds for food, clothing, and shelter. Sections 20 *CFR* 416.305-416.335 of the *Code of Federal Regulations* provide that we create a prescribed form to collect the information we request for SSI payments.

2. Description of Collection

SSA uses Form SSA-8001-BK to determine an applicant's eligibility for SSI and the SSI payment amounts. SSA employees also collect this information during interviews with members of the public who wish to file for SSI. SSA uses the information for two purposes: (1) To formally deny SSI for non-medical reasons when information the applicant provides results in ineligibility; or (2) to establish a disability claim, but defer the complete development of non-medical issues until SSA approves the disability. The respondents are applicants for SSI payments.

3. Use of Information Technology to Collect the Information

In accordance with the agency's Government Paperwork Elimination Act plan, SSA created and uses the Supplemental Security Income (SSI) Claim System, and the Preliminary Claims System (PCS) screens to document information we obtain from individuals. We use the paper version of Form SSA-8001-BK when we have a temporary computer failure. Both the SSI Claim System and the PCS screens are Intranet-based screens that allow technicians to collect the data to process applications for SSI. The development of these Intranet screens prompted changes to the SSA-8001-BK, which is the paper version of the SSI application. Based on our data, we estimate SSA obtains approximately 90% of SSI applications under this OMB number using the SSI Claims System and PCS screens.

In addition, we revised our agency Internet iClaim application (OMB No. 0960-0618) to allow qualified individuals the ability to submit an online application for SSI disability payments when they complete the Internet Disability Application. While we account for the additional burden for iClaim users under OMB No. 0960-0618, we account for the burden of asking the remaining questions to determine eligibility for SSI, which are not currently part of the iClaim process, in #12 below.

4. **Why We Cannot Use Duplicate Information**

Form SSA-8001-BK, Application for Supplemental Security Income, and Form SSA-8000-BK, Application for Supplemental Security Income Title XVI (OMB No. 0960-0229) both collect this type of information. We use the SSA-8001-BK when we are taking an abbreviated application (i.e., claimants do not meet the non-medical requirements and they will be denied for that reason). We also use Form SSA-8001-BK when we will defer non-medical development until after we get a medical decision. However, the respondent only has to complete one of these two forms. Therefore, respondents only have to provide the information once, to avoid collecting duplicate information.

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-8001-BK, the public would have no vehicle with which to apply for SSI. SSA collects this information on an as needed basis; therefore, 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**

SSA published the 60-day advance Federal Register Notice on November 9, 2018, at 83 FR 56133, and we received no public comments. SSA published the second Notice on January 25, 2019 at 84 FR 371. 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)
SSI Claims System/PCS Screens	802,368	1	20	267,456
iClaim/SSI Claims System	168,661	1	20	56,220
SSA-8001-BK (Paper Version)	2,588	1	20	863
Totals	973,617			324,539

The total burden for this ICR is **324,539**. 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 on the respondents.

14. **Annual Cost To Federal Government**

The annual cost to the Federal Government is approximately \$7,347,049. 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. The figure reported in 2016 was an estimate. In this ICR, we were able to obtain the actual number of respondents for the FY17 and adjusted the annual cost accordingly. In addition, we also increased this cost to reflect the additional costs for updating and maintaining the Preliminary Claims System.

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

The increase in burden hours is due to an increase in the number of respondents applying for benefits. iClaim allows a defined group of Title II disability applicants the ability to include an SSI deferred application with their Title II disability iClaim application. Since iClaim is the collection method for these deferred applications, we are capturing these respondents in the iClaim burden information for OMB No. 0960-0618. However, we have a collection method titled "iClaim/SSI Claims System" which represents the burden information for SSI deferred applications that originate in iClaim but require SSA to collect additional information from the SSA-8001-BK in SSI Claims System. We are providing an estimate of respondents for this collection method based on the number of Title II disability iClaims filed in FY 2017 that resulted in concurrent applications and became SSI only claims due to technical ineligibility for Title II. We do not expect the burden response time to change for these respondents.

16. **Plans for Publication Information Collection Results**
SSA will not publish the results of the information collection.

17. **Displaying the OMB Approval Expiration Date**
For the **Paper version** of the SSA-8001-BK, 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.

For the **Intranet versions** of form SSA-8001-BK, SSA is not requesting an exception to the requirement to display the OMB approval expiration date.

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.