

**Supporting Statement for Form SSA-8508 BK
Supplemental Security Income (SSI) –
Quality Review Case Analysis
OMB No. 0960-0133**

A. Justification

1. Introduction/Authoring Laws and Regulations

Authority for quality review (QR) of the Supplemental Security Income (SSI) payment process is in Section 1631(d)(1) of the *Social Security Act (Act)*, which indicates that provisions of Section 205(a) of the *Act* apply under Title XVI to the same extent as under Title II. Section 205(a) of the *Act* specifies the Commissioner of Social Security shall adopt reasonable proper rules and regulations to regulate and provide for the nature and extent of the proofs and evidence, and the methods of taking and furnishing the same, to establish the right to benefits. Section 1631(e)(1)(B) of the *Act* provides the Social Security Administration (SSA) will not determine eligibility for SSI payments solely on declarations by the applicant, but independent or collateral sources will also verify evidence. We will obtain additional information as necessary to assure correct eligibility and payment amount. Section 1611(c)(1) of the *Act* specifies the Commissioner of Social Security may determine eligibility for and the amount of such benefits.

2. Description of Collection

To assess the SSI program and ensure the accuracy of its payments, SSA conducts legally mandated periodic SSI case analysis quality reviews. SSA uses Form SSA-8508 to conduct these reviews, collecting information on operating efficiency; the quality of underlying policies; and the effect of incorrect payments. SSA also uses the data to determine SSI program payment accuracy rates, which are a performance measure of the agency's service delivery goals.

The electronic SSA-8508-BK, e8508, is a standalone Excel application that resides in the user's desktop, or tablet, personal computer. The Social Insurance Specialist uploads the data to our Electronic Quality Assurance system, and has the ability to review or edit the data on an as needed basis, until they close or clear the case. The respondents are recipients of SSI payments selected for the quality reviews.

3. Use of Information Technology to Collect the Information

In accordance with the agency's Government Paperwork Elimination Act plan, SSA created an electronic version of Form SSA-8050-BK, the e8508 Excel application. 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

Duplication of information on Form-SSA-8508-BK is inherent (and necessary) in

this process, because we use the data we collect to verify information of record.

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-8508-BK, we would compromise the agency’s ability to monitor the accuracy and effectiveness of the SSI program efficiently. We would have no way to establish national accuracy rates or to develop profiles for improving the redetermination process without the information gathered on this interview form. In addition, without this information, it would be more difficult to make recommendations for corrective action. Because we collect this information on an as needed basis, we cannot collect it less frequently. There are no technical or legal obstacles that prevent 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 December 23, 2019 at 84 FR 70610, and we received no public comments. SSA published the second Notice on February 25, 2020, at 85 FR 10804. If we receive comments in response to the 30-day 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) | Average Theoretical Hourly Cost Amount (dollars)* | Total Annual Opportunity Cost (dollars)** |
|-------------------------------|------------------------------|------------------------------|--|--|--|--|
| SSA-8508-BK (paper) | 230 | 1 | 60 | 230 | \$10.22* | \$2,351** |

| | | | | | | |
|-----------------------|--------------|---|----|--------------|---------|-------------------|
| interview) | | | | | | |
| e8508 (electronic) | 4,370 | 1 | 60 | 4,370 | \$9.22* | \$44,661** |
| Totals | 4,600 | | | 4,600 | | \$47,012** |

* We based this figure on average DI payments, as reported in SSA’s disability insurance payment data.

** This figure does not represent actual costs that SSA is imposing on recipients of Social Security payments to complete this application; rather, these are theoretical opportunity costs for the additional time respondents will spend to complete the application. **There is no actual charge to respondents to complete the application.**

The total estimated burden for this ICR is **4,600** hours (reflecting SSA management information data), which results in an associated theoretical (not actual) opportunity cost financial burden of **\$47,012**. This figure represents the theoretical amount a respondent could have earned during the time they completed the form. SSA does not actually charge respondents to complete our applications.

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 \$5.15 million. This estimate accounts for costs from the following areas: (1) designing, printing, and distributing SSA-8508-BK; (2) SSA employee (e.g., field office, 800 number, DDS staff) information collection and processing time; and (3) updating, and maintenance costs for the e8508 Excel application.

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

Previously we reported a burden of 4,500. We have increased the burden for this ICR by 100 hours, due to a normal fluctuation in the number of SSI cases. To monitor the accuracy and effectiveness of the SSI program efficiently, we need to increase the number of cases we review for this collection.

16. **Plans for Publication Information Collection Results**

We publish a report based on Form SSA-8508-BK findings at the end of each sample period, which is available to the public, upon request, through the Freedom of Information Act. A typical report presents the national payment accuracy rate for the sample period and provides a comparison of the new accuracy rate established for previous periods. It also presents deficiency dollar information by program area, including comparison of current and previous deficiency data.

We break down error data into overpayments and underpayments, and further

analyzed in terms of the five eligibility elements most often involved. We make an additional distinction between those deficiencies which should be subject to a high degree of SSA's control, or which result from failure of SSA to discharge its responsibilities properly, and those that result from failure of the recipient to report information fully and accurately to SSA. Finally, we provide specific data about the deficiency's source (e.g., failure to report a change, incorrect determination, systems failure) within each of these two categories of responsibility.

17. Displaying the OMB Approval Expiration Date

For the paper Form SSA-8508-BK, we do not publish 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.

For the electronic version of Form SSA-8508-BK, e8508, 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)*.