

**Supporting Statement for Forms SSA-623, SSA-6230, SSA-6234,
Representative Payee Report (for Adult and Child Beneficiaries
and for Organizational Representative Payees)
and iRPA (Internet Representative Payee Accounting) &
My Representative Payee Accounting (MyRPA
20 CFR 404.635, 404.2035, 404.2065, and 416.665
OMB No. 0960-0068**

A. Justification

1. Introduction/Authoring Laws and Regulations

Section 1631(a) of the *Social Security Act (Act)* and Sections 20 CFR 404.635, 404.2035, 404.2065, and 416.665 of the *Code of Federal Regulations* state that, in such cases, we can designate a representative payee to act on behalf of beneficiaries when the Social Security Administration (SSA) determines it is not in beneficiaries' best interest to receive their benefit payments directly.

2. Description of Collection

When SSA determines it is not in an Old Age Survivors and Disability Insurance (OASDI), or Supplemental Security Income (SSI) recipient's best interest to receive Social Security payments directly, the agency will designate a representative payee for the recipient. The representative payee can be: (1) a family member; (2) a non-family member who is a private citizen and is acquainted with the beneficiary; (3) an organization; (4) a state or local government agency; or (5) a business. In the capacity of representative payee, the person or organization receives the SSA recipient's payment directly, and manages these payments.

As part of its stewardship mandate, SSA must ensure the representative payees are properly using the payments they receive for the recipients they represent. The agency annually collects the information necessary to make this assessment using the SSA-623, Representative Payee Report-Adult; SSA-6230, Representative Payee Report-Child; SSA-6234, Representative Payee Report-Organizational Representative Payees. Additionally, the electronic internet applications, Internet Representative Payee Accounting (iRPA) and My Representative Payee Accounting (MyRPA), which is part of the *my Social Security* suite of services, allow individual representative payees to complete Annual Accounting reports online. Section 102 of the *Strengthening Protections for Social Security Beneficiaries Act of 2018* exempts certain representative payees from our annual accounting requirements. The exempt representative payees are:

- A natural or adoptive parent of a minor child entitled to Title II benefits or eligible for Title XVI payments who primarily resides in the same household as the beneficiary;
- A legal guardian of a minor child entitled to Title II benefits or eligible for

Title XVI payments who primarily resides in the same household as the beneficiary;

- A natural or adoptive parent of a disabled individual (as defined in section 223(d) of the Act) entitled to Title II benefits or eligible for Title XVI payments who primarily resides in the same household as the beneficiary; and
- The spouse of an individual entitled to Title II benefits or eligible for Title VIII or Title XVI payments.

The respondents are representative payees of OASDI and SSI recipients.

3. Use of Information Technology to Collect the Information

In accordance with the agency's Government Paperwork Elimination Act plan, SSA created internet versions of Forms SSA-623, SSA-6230, and SSA-6234 (MyRPA and iRPA). Based on our data, we estimate approximately 18% of respondents under this OMB number use the electronic versions.

4. Why We Cannot Use Duplicate Information

The nature of the information we collect and the manner in which we collect it precludes duplication. SSA does not use another collection instrument to obtain similar data.

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 collect the information on Forms SSA-623, SSA-6230, SSA-6234, MyRPA and iRPA, we would not be able to ensure representative payees use the money they receive from us for the beneficiary's benefit. Since we only collect information annually to reflect the past year's use of SSA payments, 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

The 60-day advance Federal Register Notice published on June 5, 2020 at 85 FR 34703, and we received no public comments. The 30-day FRN published on August 20, 2020 at 85 FR 51540. 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

Please see the burden chart below:

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)**	Average Wait Time in Field Office (minutes)***	Total Annual Opportunity Cost (dollars)****
SSA-623	1,086,152	1	15	271,538	\$10.73*	24**	\$7,575,367***
SSA-6230	97,196	1	15	24,299	\$10.73*	24**	\$677,893***
SSA-6234	497,505	1	15	124,376	\$10.73*	24**	\$3,469,845***
iRPA+	290,253	1	15	72,563	\$10.73*		\$778,601***
myRPA+	70,021	1	15	17,505	\$10.73*		\$187,829***
Totals	2,041,127			510,281			\$12,689,535***

+ All forms (SSA-623, SSA-6230, & SSA-6234) can also be accessed via the internet platforms, iRPA and myRPA.

* We based this figure on average DI payments based on SSA's current FY 2020 data (<https://www.ssa.gov/legislation/2020Fact%20Sheet.pdf>).

** We based this figure on the average FY 2020 wait times for field offices, based on SSA's current management information 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.**

In addition, OMB's Office of Information and Regulatory Affairs is requiring SSA to use a rough estimate of a 30-minute, one-way, drive time in our calculations of the time burden for this collection. OIRA based their estimation on a spatial analysis of SSA's current field office locations and the location of the average population centers based on census tract information, which likely represents a 13.97-mile driving distance for one-way travel. We depict this on the chart below:

Total Number of Respondents Who Visit a Field Office	Frequency of Response	Average One-Way Travel Time to a Field Office (minutes)	Estimated Total Travel Time to a Field Office (hours)	Total Annual Opportunity Cost for Travel Time (dollars)*****
1,680,853	1	30	840,427	\$9,017,782

***** We based this dollar amount on the Average Theoretical Hourly Cost Amount in dollars shown on the burden chart above.

Per OIRA, we include this travel time burden estimate under the 5 CFR 1320.8(a) (4), which requires us to provide “time, effort, or financial resources expended by persons [for]...transmitting, or otherwise disclosing the information,” as well as 5 CFR 1320.8(b)(3)(iii) which requires us to estimate “the average burden collection...to the extent practicable.” SSA notes that we do not obtain or maintain any data on travel times to a field office, nor do we have any data, which shows that the average respondent drives to a field office, rather than using any other mode of transport. SSA also acknowledges that respondents’ mode of travel and, therefore, travel times vary widely dependent on region, mode of travel, and actual proximity to a field office.

NOTE: We included the total opportunity cost estimate from this chart in our calculations when showing the total opportunity cost estimates in the paragraph below.

The total burden for this ICR is **510,281** burden hours (reflecting SSA management information data), which results in an associated theoretical (not actual) opportunity cost financial burden of **\$21,707,317**. SSA does not 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 \$15,508,863. This estimate accounts for costs from the following areas:

Description of Cost Factor	Methodology for Estimating Cost	Cost in Dollars*
Designing, Printing, and Distributing the Form	Design Cost + Printing Cost + Distribution Cost	\$16,809
SSA Employee (e.g., field office, 800 number, DDS staff) Information Collection and Processing Time	GS-9 employee x # of responses x processing time	\$15,488,634
Systems Development, Updating, and	GS-9 employee x man hours for	\$3,420

Maintenance	development, updating, maintenance	
Total		\$15,508,863

SSA is unable to break down the costs to the Federal government further than we already have. First, since we work with almost every US citizen, we often do bulk mailings, and cannot track the cost for a single mailing. We do not track design costs or upkeep costs (as these are based on employee time and may vary from collection to collection). In addition, it is difficult for us to break down the cost for processing a single form, as field office and State Disability Determination Services staff often help respondents fill out several forms at once, and the time it takes to do so can vary greatly per respondent. As well, because so many employees have a hand in each aspect of our forms, we use an estimated average hourly wage, based on the wage of our average field office employee (GS-9) for these calculations. Finally, SSA prefers not to provide breakdowns of estimated payment to employees who process these items for a variety of reasons (only one of which is that it is not possible to do this entirely accurately).

15. Program Changes or Adjustments to the Information Collection Request

When we last cleared this IC in 2017, the burden was 1,169,074 hours. However, we are currently reporting a burden of 510,281 hours. Section 102 of the *Strengthening Protections for Social Security Beneficiaries Act of 2018* exempted certain representative payees from our annual accounting requirements. Accordingly, we stopped mailing accounting forms to certain exempted payees beginning June 22, 2018 for Title II, and July 6, 2018 for Title XVI and concurrent cases. This change resulted in a decrease in the number of responses from 4,676,294 to 2,041,127. There is no change to the burden time per response. These figures represent current Management Information data.

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 forms, 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 Internet versions, SSA is not requesting an exception to the requirement to display the OMB approval expiration date.

1. 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.