

Supporting Statement for Form SSA-L5061
Letter to Landlord Requesting Rental Information
20 CFR 416.1130(b)
OMB No. 0960-0454

A. Justification

1. Introduction/Authoring Laws and Regulations

Section 1612(a)(2)(A) of the *Social Security Act (Act)* provides for a reduction by 33 and 1/3 percent of Supplemental Security Income (SSI) benefits for eligible individuals who receive in-kind support and maintenance. Section 1631(e)(1)(B) of the *Act* further requires the Social Security Administration (SSA) to verify information used to determine eligibility for SSI benefits by independent or collateral sources. Part 20 *CFR 416.1130(b)* of the *Code of Federal Regulations* describes the circumstances under which SSA may consider in-kind support and maintenance from a rental subsidy. To identify rental subsidy arrangements for individuals who apply for SSI benefits, and individuals who are already getting SSI benefits, SSA uses Form SSA-L5061, Letter to Landlord Requesting Rental Information, to collect necessary information.

2. Description of Collection

SSA uses Form SSA-L5061 to obtain rental subsidy information, which enables the agency to determine and verify an income value for these subsidies. We use this income value to determine eligibility for SSI, and to calculate the correct amount of SSI payable to the claimant. SSA bases an individual's eligibility for SSI payments, in part, on the amount of countable income the individual receives. Income includes in-kind support and maintenance in the form of room or rent, such as a subsidized rental arrangement. SSA requires claimants to assist in obtaining this information to prevent a delay or overpayment with their SSI payments. We collect this information only if the SSI applicant or recipient is the parent or child of the landlords (respondent). For most respondents, we collect this information once per year or less, via telephone or face-to-face personal interview. The Claim Specialist (CS) records the information in our SSI Claims System, and we require verbal attestation in lieu of a wet signature. However, if the CS is unable to contact the respondent via the telephone or face-to-face interview, we print and mail a paper form to the respondent for completion. The respondent completes, signs, and returns the form to the CS. Upon receipt, the CS documents the information in the SSI Claims System or, for non-SSI Claims System cases, faxes the form into the appropriate electronic folder and shreds the paper form. The respondents are landlords related to the SSI beneficiaries as a parent or child.

3. Use of Information Technology to Collect the Information

In accordance with the agency's Government Paperwork Elimination Act (GPEA) plan, SSA created an Intranet version of Form SSA-L5061 through our SSI Claims System. Based on our data, we estimate approximately 100% of

respondents under this OMB number use the electronic version. Per the documentation we provided to OIRA, SSA’s internal systems and Intranet modalities are in compliance with GPEA. This form is also available on SSA’s website as a print-only PDF.

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 use Form SSA-L5061, SSA would have no means to collect information needed to make accurate determinations of eligibility and benefit amounts as required by statute. Because we collect this information on an as needed basis, 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 collect this information in a manner that is not consistent 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 24, 2020 at 85 FR 37996, and we received no public comments. The 30-day FRN published on August 28, 2020 at 85 FR 53428. 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	Average Burden	Estimated Total	Average Theoretical	Average Wait	Total Annual Opportuni
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		Response	per Response (minutes)	Annual Burden (hours)	Hourly Cost Amount (dollars)*	Time in Field Office (minutes) **	Cost (dollars)**
SSA-L5061	71,280	1	10	11,880	\$25.72*	24**	\$1,038,880

* We based this figure on average U.S. worker’s hourly wages, as reported by Bureau of Labor Statistics data (https://www.bls.gov/oes/current/oes_nat.htm).

** 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)****
71,280	1	30	35,640	\$916,661

****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 **11,880** burden hours (reflecting SSA management information data), which results in an associated theoretical (not actual) opportunity cost financial burden of **\$1,955,544**. 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 \$409,980. 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	\$175
SSA Employee (e.g., field office, 800 number, DDS staff) Information Collection and Processing Time	GS-9 employee x # of responses x processing time	\$406,385
Systems Development, Updating, and Maintenance	GS-9 employee x man hours for development, updating, maintenance	\$3,420
Total		\$409,980

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 12,000 hours. However, we are currently reporting a burden of 11,880 hours. This change stems from a decrease in the number of responses from 72,000 to 71,280. There is no change

to the burden time per response. Although the number of responses changed, SSA did not take any actions to cause this change. 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 Form SSA-L5061, 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.

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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.