

Supporting Statement for Internet Direct Deposit Application
31 CFR 210
OMB No. 0960-0634

A. Justification

1. Introduction/Authoring Laws and Regulations

Recipients of Social Security payments may choose to receive their payments through the Direct Deposit Program, under which the payments go directly to the recipient's accounts at their financial institutions (FI). To route payments to the accounts at the FI, SSA needs two key pieces of information: (1) the depositor's account number; and (2) the routing transit number of the receiving FI. The Treasury, Federal Reserve System, and the FI use this information to route payment to the recipient's account. Under the authority of *31 CFR 210*, *5 USC 301*, and *12 USC 391*, the Social Security Administration (SSA) collects this information through the Internet Direct Deposit Application.

2. Description of Collection

SSA requires all applicants and recipients of Social Security Old Age, Survivors, and Disability Insurance (OASDI) benefits, or Supplemental Security Income (SSI) payments to receive their benefits and payments via direct deposit at an FI. SSA receives Direct Deposit/Electronic Funds Transfer (DD/EFT) enrollment information from OASDI beneficiaries and SSI recipients to facilitate DD/EFT of their funds with their chosen FI. We also use this information when an enrolled individual wishes to change their DD/EFT information. For the convenience of the respondents, we collect this information through several modalities, including an Internet application, and in-office or telephone interviews. In Fiscal Year (FY) 2013, SSA discontinued the Direct Deposit automated telephone application. Callers, who contact the National 800 Number Network (N8NN) to start, change, or cancel direct deposit of their SSA payments, have their call automatically routed to the next available agent for assistance. In addition to using the direct deposit information to enable DD/EFT of funds to the recipients' chosen FI, we also use the information through our Direct Deposit Fraud Indicator to ensure the correct recipient receives the funds. Respondents are OASDI beneficiaries and SSI recipients requesting enrollment in the Direct Deposit program, or changes to their direct deposit banking information.

3. Use of Information Technology to Collect the Information

In accordance with the agency's Government Paperwork Elimination Act (GPEA) plan, SSA created an Internet, Intranet, and automated version for the Internet Direct Deposit Application. Based on our data, we estimate approximately 100% of respondents under this OMB number use an electronic version.

4. **Why We Cannot Use Duplicate Information**
The nature of the information we collect and the manner in which we collect it preclude duplication. SSA does not use another collection instrument to obtain similar data.
5. **Minimizing Burden on Small Respondents**
This collection does not significantly affect small businesses or other small entities.
6. **Consequence of Not Collecting Information or Collecting it Less Frequently**
If we did not use the Direct Deposit Application, SSA would not be able to enroll recipients wishing to participate in the Direct Deposit Program. This would be an inconvenience to the recipient, and cost the Agency time and money since we would have to print and mail out checks to recipients. 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 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 January 25, 2019, at 84 FR 371, and we received no public comments. The 30-day FRN published on March 27, 2019 at 84 FR 11625. 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 payment or gifts to 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)
Internet DD	432,482	1	10	72,080

Non-Electronic Services (FO, 800#-ePath, SSI Claims System, SPS, MACADE, POS, RPS)	3,227,426	1	12	645,485
Direct Deposit Fraud Indicator	33,238	1	2	1,108
Totals	3,693,146			718,673

The total burden for this ICR is **718,673** hours. We based this figure 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 on the respondents.

14. Annual Cost to Federal Government

The annual cost to the Federal Government is approximately \$215,187. This estimate accounts for costs from the following areas: (1) SSA employee (e.g., field office, 800 number, DDS staff) information collection and processing time; and (2) 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 749,807 hours. However, we are currently reporting a burden of 718,673 hours. This change stems from a decrease in the number of responses for the Internet Direct Deposit Application from 507,214 to 432,482; a decrease in the responses for the Non-Electronic Services from 3,317,351 to 3,227,426; and a decrease in the number of responses for the Direct Deposit Fraud Indicator from 54,016 to 33,238. We consider these decreases normal fluctuation in burden, because in a previous clearance we made Internet Direct Deposit mandatory for all respondents, so large numbers of people needed to sign up. However, we are seeing an expected decrease in respondents since most people have signed up for Internet Direct Deposit, and we are now seeing mostly new claimants and beneficiaries who need to sign up in the Direct Deposit System. 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.

16. Plans for Publication Information Collection Results

SSA will not publish the results of the information collection.

17. Displaying the OMB Approval Expiration Date

SSA is not requesting an exemption to displaying the OMB expiration date on the Internet or Intranet screens.

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.