

**Supporting Statement for Forms
SSA-9301, SSA-9302, SSA-9303, SSA-9304, SSA-9308, SSA-9310,
SSA-9311, SSA-9312, SSA- 9313, SSA-9314
Medicare Subsidy Quality Review Forms
20 CFR 418(b)(5)
OMB No. 0960-0707**

A. Justification

1. Introduction/Authoring Laws and Regulations

Under the aegis of the Medicare Modernization Act of 2003, the Social Security Administration (SSA) makes Medicare Part D subsidy redeterminations of continued eligibility. We base the subsidy redeterminations on beneficiaries' answers to questions about categories such as household size, income, and assets. Since applicants self-report this information using Form SSA-1020 (OMB No. 0960-0696), the application form for the Part D subsidy, SSA needs a way to determine if the information is accurate and complete, as per section 1860 D-14(a) (3)(E)(iii)(III) of the *Social Security Act* and section 20 CFR 418(b)(5) of the *Code of Federal Regulations*.

Since August 2005, SSA uses 0960-0707, the Medicare Subsidy Quality Review Case Analysis system, to conduct the required review and verification of select Part D subsidy recipients. Under this system, SSA contacts a random sample of applicants for the Medicare Part D Subsidy and tells them to expect a phone call from the agency. During this phone call, SSA interviews applicants to confirm, and perhaps expand on, information they reported on Form SSA-1020 (OMB No. 0960-0696).

2. Description of Collection

SSA uses the 10 information collection tools in this information collection request to conduct the Medicare Subsidy Quality Review. The purpose of these tools is to help SSA confirm the information reported on Form SSA-1020, and to validate its Medicare Part D subsidy determinations. This collection is voluntary for respondents and required for the review and verification of select Medicare Part D subsidy recipients. SSA employees will conduct this IC and request the information from Medicare Part D subsidy recipients on a triennial basis. We list and describe the information collection tools below:

- a. **SSA-9301: Medicare Subsidy Quality Review Case Analysis Questionnaire** - This is the telephone questionnaire SSA employees administer to applicants for the Medicare Part D Subsidy. It includes questions about the applicant's family size, marital status, income, assets, etc.

- b. **SSA-9302: Notice of Appointment-Reviewer Will Call** - After receiving notice of the scheduled date and time of the telephone questionnaire, Medicare Part D applicants return this form confirming their availability for the interview, and making note of any special needs for the call. This version is for applicants whose phone numbers we already know and, thus, for whom we can pre-schedule the call.
- c. **SSA-9303: Notice of Appointment-Please Call Reviewer** - This form is similar to Form SSA-9302, except it is for participants who do not have phones, or for those participants for whom SSA does not know the phone numbers. On this form, participants confirm receipt of the letter and we ask them to call SSA on a specified date.
- d. **SSA-9304: Checklist of Required Information** - This checklist, which accompanies Forms SSA-9302, SSA-9303, SSA-9311, SSA-9312, SSA-9313, and SSA-9314, is a list of the documentation respondents need to have available when SSA calls them to conduct the Quality Review phone interview. We account for the burden for this checklist in the burdens for Forms SSA-9302, SSA-9303, SSA-9311, SSA-9312, SSA-9313, and SSA-9314, therefore; we do not account for the burden separately.
- e. **SSA-9308: Request for Information** - SSA sends this form to various third parties (e.g., businesses besides insurance companies) to obtain or confirm information applicants report for the Medicare Part D subsidy.
- f. **SSA-9310: Request for Documents** - Following the phone interview, SSA sends this notice to the applicants advising them of the documents they must return to SSA.
- g. **SSA-9311: Notice of Appointment-Denial-Reviewer Will Call** - After receiving notice of the scheduled date and time of the telephone questionnaire, Medicare Part D applicants return this form confirming their availability for the interview, and making note of any special needs for the call. This version is for applicants whose phone numbers we know and, thus, we can pre-schedule the call. We tailored the language on this form for those Medicare Part D subsidy applicants with denied applications.
- h. **SSA-9312: Notice of Appointment-Denial-Please Call Reviewer** - This form is similar to Form SSA-9311, except it is for participants who do not have phones, or for whom SSA does not know the phone numbers. On this form, participants confirm receipt of the letter, and we ask them to call SSA on a specified date. This form is also designed for Medicare Part D subsidy applicants whose applications we denied.

- i. **SSA-9313: Notice of Appointment-Redetermination-Reviewer Will Call** - After receiving notice of the scheduled date and time of the telephone interview, Medicare Part D beneficiaries return this form confirming their availability for the interview, and making note of any special needs for the call. This version is for beneficiaries whose phone numbers we know and, thus, we can pre-schedule the call.
- j. **SSA-9314: Notice of Appointment-Redetermination-Reviewer Will Call** - This form is similar to Form SSA-9313, except it is for beneficiaries who do not have phones, or for whom SSA does not know the phone numbers. On this form, beneficiaries confirm receipt of the letter and we ask them to call SSA on a specified date.

3. **Use of Information Technology to Collect the Information**

SSA currently conducts this information collection by mail only. We did not create an Internet version of Forms SSA-9301, SSA-9302, SSA-9303, SSA-9304, SSA-9308, SSA-9310, SSA-9311, SSA-9312, SSA-9313, and SSA-9314 under the Government Paperwork Elimination Act. In addition, we cannot collect these through email or fax due to PII concerns. As per our 4/3/20 conversation with OIRA, we welcome OIRA to join our conversations with OMB on IT Mods; however, as our IT Mod programming is an ongoing project, we cannot provide timelines for when we will be able to make any particular ICR available via the Internet. We will convert existing ICRs to full electronic versions depending on how they fall within our overall IT Mod schema, but this unconnected to the PRA approval lifecycle.

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 SSA did not collect this information, SSA would be unable to conduct the mandatory verification of information reported in OMB No. 0960-0696. Because we only conduct the Medicare Subsidy Quality Review process once per selected participant, we cannot conduct 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 November 27, 2020, at 85 FR 76142, and we received no public comments. The 30-day FRN published on January 28, 2021, at 86 FR 7446. 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 these forms.
9. **Payment or Gifts to the Respondents**
 SSA does not provide payment 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-9301 (Medicare Subsidy Quality Review Case Analysis Form)	3,500	1	30	1,750	\$25.72*	\$45,010**
SSA-9302 (Notice of Quality Review Acknowledgment Form for those with Phones)	3,500	1	15	875	\$25.72*	\$22,505**
SSA-9303 (Notice of Quality Review Acknowledgment Form for those without Phones)	350	1	15	88	\$25.72*	\$2,263**

SSA-9308 (Request for Information)	7,000	1	15	1,750	\$25.72*	\$45,010**
SSA-9310 (Request for Documents)	3,500	1	5	292	\$25.72*	\$7,510**
SSA-9311 (Notice of Appointment-Denial -Reviewer Will Call)	450	1	15	113	\$25.72*	\$2,906**
SSA-9312 (Notice of Appointment-Denial-Please Call Reviewer)	50	1	15	13	\$25.72*	\$334**
SSA-9313 (Notice of Quality Review acknowledgment Form for those with Phones)	2,500	1	15	625	\$25.72*	\$16,075**
SSA-9314 (Notice of Quality Review acknowledgement Form for those without Phones)	500	1	15	125	\$25.72*	\$3,215**
Total	21,350			5,631		\$144,828**

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

** 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 burden for this ICR is **5,631** burden hours (reflecting SSA management information data), which results in an associated theoretical (not actual) opportunity cost financial burden of **\$144,828**. 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 for this collection is approximately **\$245,934**. This estimate accounts for costs from the following areas:

Description of Cost Factor	Methodology for Estimating Cost	Cost in Dollars*
Designing and Printing the Form	Design Cost + Printing Cost	\$6,280
Distributing, Shipping, and Material Costs for the Form	Distribution + Shipping + Material Cost	\$0
SSA Employee (e.g., field site and central office staff) Information Collection and Processing Time	GS-12 employee x # of responses x processing time	\$239,654
Full-Time Equivalent Costs	Out of pocket costs + Other expenses for providing this service	\$0
Systems Development, Updating, and Maintenance	GS-9 employee x man hours for development, updating, maintenance	\$0
Quantifiable IT Costs	Any additional IT costs	\$0
Total		245,934

* We have inserted a \$0 amount for cost factors that do not apply to this collection.

SSA is unable to break down the costs to the Federal government further than we already have. It is difficult for us to break down the cost for processing a single form, because so many employees mail 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. However, we have calculated these costs as accurately as possible based on the information we collect for creating, updating, and maintaining these information collections.

15. Program Changes or Adjustments to the Information Collection Request

There are no changes to the public reporting burden.

16. Plans for Publication Information Collection Results.

SSA will not publish the results of the information collection.

17. Displaying 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.

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.