

**Supporting Statement for Form SSA-8010-BK**  
**Statement of Income and Resources**  
**20 CFR 416.207, 416.301-310, 416.704, and 416.708**  
**OMB No. 0960-0124**

**A. Justification**

**1. Introduction/Authoring Laws and Regulations**

The Social Security Administration (SSA) must establish and verify the amount of earned and unearned income and resources available to individuals applying for or receiving Supplemental Security Income (SSI). This can include income and resources of SSI-ineligible parents; spouses; essential persons (i.e. certain persons who were converted from state welfare rolls in 1974, of which there are less than 100 remaining nationwide); and for some aliens and their sponsor(s). SSA uses Form SSA-8010-BK to collect the information from those individuals. SSA's authority to do so is contained in 42 U.S.C. 1382; sections 1612(a), 1613(a), 1614(f), 1621, and 1631(e) of the *Social Security Act*; and Sections 20 CFR 416.207, 416.301-310, 416.704, and 416.708 of the *Code of Federal Regulations*.

**2. Description of Collection**

SSA uses Form SSA-8010-BK to collect and verify income and resource information from individuals whose income and resources may be deemed by law (i.e., considered available) to the SSI claimant or recipient. SSA needs this information to make an initial or continuing SSI eligibility determination. Form SSA-8010-BK is not a self-help form; an SSA interviewer assists the respondent with filling out the form. The respondents are persons whose income and resources SSA considers deemed to applicants or recipients of SSI payments.

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

We collect information on the paper version of this form, and electronically during a personal or telephone interview using SSA's SSI Claims system. In accordance with the agency's Government Paperwork Elimination Act (GPEA) plan, SSA created an Intranet version of Form SSA8010-BK through SSI Claims System/. Based on our data, we estimate approximately 97% 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 collection does not currently have a fully public-facing Internet version, as we prioritized other information collections for full electronic conversions. 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**

SSA does collect information about income and resources on other forms. However, 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 regarding information from individuals whose income is subject to deeming, other than an SSI-ineligible spouse.

Forms SSA-8000-BK (OMB Control No. 0960-0229) and SSA-8203-BK (OMB Control No. 0960 0416) request the same (and more) information from an SSI applicant or recipient and the SSI-ineligible spouse. SSA uses Form SSA-8010-BK to request income and resource information from individuals other than the claimant and the claimant's spouse when we need this information to determine SSI eligibility or continuing SSI eligibility (e.g. the parent(s) of an SSI-ineligible son or daughter).

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 this information, or we collected it less frequently, it would result in improper SSI payments. Even though we require affected individuals to report changes in circumstances, SSA must be able to collect these reports through other means, such as periodic SSI eligibility determinations (usually made once a year). 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 August 28, 2020, at 85 FR 53428, and we received no public comments. The 30-day FRN published on November 04, 2020 at 85 FR 70216. 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 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 (dollars)*	Average Wait Time in Field Office (minutes)**	Total Annual Opportunity Cost (dollars)***
SSA-8010-BK (Intranet)	1,855,340	1	20	618,447	\$10.73*	24**	\$14,550,000
SSA-8010-BK (Paper)	61,380	1	20	20,460	\$10.73*	24**	\$4,800,000
<b>Totals</b>	<b>1,916,720</b>			<b>638,907</b>			<b>\$15,000,000</b>

\*We based this figures on average U.S. citizen’s hourly salary, as reported by Bureau of Labor Statistics 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 our current management information data.

\*\*\*This figure does not represent actual costs that we are 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)*****
1,916,720	1	30	958,360	\$10,283,203*****

\*\*\*\*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 total opportunity cost estimate from this chart in our calculations when showing the total time and opportunity cost estimates in the paragraph below.

We base our burden estimates on current management information data, which includes data from actual interviews, as well as from years of conducting this information collection. Per our management information data, we believe that 10 minutes accurately shows the average burden per response for reading the instructions, gathering the facts, and answering the questions. Based on our current management information data, the current burden information we provided is accurate. The total burden for this collection instrument is **638.907** burden hours (reflecting SSA management information data), which results in an associated theoretical (not actual) opportunity cost financial burden of **\$15,082,035**. SSA does not charge respondents to complete our applications.

Please note in the chart above, the SSI Claims System burden information is also included in the burden information for initial SSI claims taken in SSI Claims System in OMB Control No. 0960-0229 (SSA-8000, SSI application). SSI Claims System leads the interviewer through a series of paths and questions. The SSI Claims System full path most closely relates to the paper SSA-8000-BK (SSI application), but it also includes questions from separate SSA forms and OMB clearances, such as the form we are clearing here (SSA-8010-BK). Depending on the response from an applicant, we may ask questions from the SSA-8010-BK as part of the SSI Claims System full path. SSI Claims System tracks and provides counts on SSI applications only. SSI Claims System does not break out separately the number of time we ask questions from a related form, or the time it takes to answer these questions. Consequently, we provide burden information on the SSI Claims System full path for the SSA-8000-BK (OMB No. 0960-0229) and here.

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 **\$19,123,852**. This estimate accounts for costs from the following areas:

<b>Description of Cost Factor</b>	<b>Methodology for Estimating Cost</b>	<b>Cost in Dollars*</b>
Designing and Printing the Form	Design Cost + Printing Cost	\$600
Distributing, Shipping, and Material Costs for the Form	Distribution + Shipping + Material Cost	\$0
SSA Employee (e.g., field office, 800 number, DDS staff) Information Collection and Processing Time	GS-9 employee x # of responses x processing time	\$766,688
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	\$1,836,564
Quantifiable IT Costs	Any additional IT costs	\$0
Other	[Component may add as needed]	\$0
<b>Total</b>		<b>\$19,123,852</b>

\* 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. First, since we work with almost every US citizen, we often do bulk mailings, and cannot track the cost for a single mailing. 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. 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**

When we last cleared this IC in 2017, the burden was 147,767 hours. However, we are currently reporting a burden of 638,907 hours. This change stems an increase in the number of responses from 341,000 to 1,916,700. This change also

stems from a decrease in the completion time from 26 minutes to 20 minutes. 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**

SSA is not requesting an exception to the requirement to display an 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)*.

**B. Collections of Information Employing Statistical Methods**

SSA does not use statistical methods for this information collection.