

**Supporting Statement for SSA-8006-F4
Statement of Living Arrangements,
In-Kind Support and Maintenance
20 CFR 416.1130-416.1148
OMB No. 0960-0174**

A. Justification

1. Introduction/Authoring Laws and Regulations

The Social Security Administration (SSA) determines Supplemental Security Income (SSI) eligibility based on a claimants' need. Under SSI program eligibility rules, SSA measures need, in part, by the amount of income an individual receives. Income includes in-kind support and maintenance (ISM) as provided by other people in the form of food and shelter. Section 1612(a)(2)(A) of the *Social Security Act (Act)* requires SSA to reduce the payments of an SSI-eligible individual who receives ISM by 33 and 1/3 percent. Section 1631(e)(1)(B)(i) of the *Act* requires that SSA must verify the information with independent or collateral sources when using it to determine eligibility for SSI. 20 CFR 416.1130- 416.1148 of the *Code of Federal Regulations* authorize the policies and procedures for implementing Section 1612(a)(2)(A) of the *Act*.

2. Description of Collection

SSA determines SSI payment amounts based on applicants' and claimants' needs. We measure individuals' needs, in part, by the amount of income they receive, including in-kind support and maintenance in the form of food and shelter which other people provide. SSA uses Form SSA-8006- F4 to determine if in-kind support and maintenance exists for SSI applicants and claimants. This information also assists SSA in determining the income value of in-kind support and maintenance SSI applicants and claimants receive. If individuals do not provide this information, we determine the income value at the highest amount. We obtain this information via interviews during initial claims, as well as through interviews when we conduct redeterminations, or post-eligibility determinations. The respondents are individuals who apply for SSI payments, or who complete the SSI eligibility redetermination.

3. Use of Information Technology to Collect the Information

SSA collects this information electronically through a personal interview during which an SSA technician enters the information directly into our SSI Claims System. We estimate approximately 90% of respondents under this OMB number use the SSI Claims System screens. This collection does not currently have a fully public-facing Internet version, as we prioritized other information collections for full electronic conversions under the Government Paperwork Elimination Act. 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**

Some of the questions on this form duplicate questions asked on Form SSA-8011-F3 (OMB No. 0960-0456). However, the householder answers the questions on the SSA-8011-F3. SSA needs the householder’s statement on the SSA-8011-F3 to corroborate the information provided by the SSI applicant or claimant on the SSA-8006-F4. In no case would the same person complete both the SSA-8006-F4 and SSA-8011-F3 forms.

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 there would be a high risk of incorrect SSI eligibility and payment determinations. SSA collects the information on an as needed basis to determine the correct SSI payments. Collecting the information less frequently would increase the risk of making incorrect payments. There are no technical or legal obstacles that prevent 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 6, 2021, at 86 FR 667 and we received no public comments. The 30-day FRN published on April 9, 2021 at 86 FR 18583. If we receive any comments in response to this Notice, we will forward them to OMB.

9. **Payment or Gifts to Respondents**

SSA provides no payment or gifts to the respondents.

10. **Assurances of Confidentiality**

SSA protects and holds confidential the information it is requesting 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	Average Wait Time in Field Office or	Total Annual Opportunity Cost (dollars)***

)		(dollars)*	Telephone Wait Time (minutes)**	
Intranet version (SSI Claims System)	109,436	1	7	12,768	\$10.73*	19**	\$508,849***
Paper version	12,160	1	7	1,419	\$10.73*	24**	\$67,417***
Totals	121,595			14,186			\$576,266***

* 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 2021 wait times for field offices (24 minutes) or average wait times for our National 800 Number (19 minutes), 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)****
12,160	1	30	2,837	\$30,441

****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.

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 **14,186** burden hours (reflecting SSA management information data), which results in an associated theoretical (not actual) opportunity cost financial burden of **\$606,707**. 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 **\$1,399,649**. 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	\$595
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	\$31,054
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	\$1,368,000
Quantifiable IT Costs	Any additional IT costs	\$0
Total		\$1,399,649

* 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, 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 2018, the burden was 20,228. However, we are currently reporting a burden of 14,186 hours. This change stems from a decrease in the number of responses from 173,380 to 121,595. 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. In addition, we updated the paper version of the form to include the required travel time estimate of 30 minutes, which changed the numbers. Even so, there is no change to the current burden time per response for the paper version of the form. 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**

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.