

Supporting Statement for Form SSA-8510
Authorization for the Social Security Administration to Obtain Personal Information
20 CFR 404.704, 404.820 - 404.823, 404.1926, 416.203, & 418.3001
OMB No. 0960-0801

A. Justification

1. Introduction/Authoring Laws and Regulations

The Social Security Administration (SSA) has authority to establish the necessary provisions to obtain proofs and evidence regarding eligibility for Social Security programs. Under Title II and Title XVI of the *Social Security Act (Act)*, SSA determines eligibility and entitlement to our programs through the collection of the proof and evidence supporting the application for benefits as per Sections 205(a) and 1631(e) of the *Act*. In addition, Sections 20 CFR 404.703, 404.704, 404.1926, 416.203, and 418.3001 of the *Code of Federal Regulations (Code)* explain the different requirements and responsibility for providing evidence regarding eligibility for SSA programs, and Sections 404.820-404.823 of the *Code* detail requirements of proof when individuals request changes to their SSA files.

2. Description of Collection

SSA uses Form SSA-8510 to contact a public or private custodian of records on behalf of an applicant or recipient of an SSA program to request non-medical evidence information or proofs, which may support a benefit application or payment continuation. For situations where medical information is required, SSA uses Form SSA-827 (OMB No. 0960-0623) to obtain medical records about the claimant's treatment, hospitalization, outpatient care, and educational records that may provide evaluations, assessments, and teacher observations for disability purposes. The SSA-8510 and SSA-827 are unrelated and cannot be substituted for the other. There may be situations in which the claimant may have to complete both forms as these authorizations are for different purposes.

SSA uses Form SSA-8510 to obtain evidence or proofs to determine the claimant's payment amount. We ask for information such as the following:

- Age (e.g., birth certificate, court documents)
- Insured status (e.g., earnings, employer verification)
- Marriage or divorce
- Pension Offsets
- Wages verification
- Annuities
- Dividends, royalties, or other similar payments
- Property information
- Benefit verification from a State agency or third party
- Immigration status (rare instances)
- Income verification from public agencies or private individuals
- Unemployment benefits

- Insurance Policies
- Alimony or Child Support payments

If the custodian of the records requires a signed authorization from the individual(s) whose information SSA requests, SSA may provide the custodian with a copy of the SSA-8510. Once the respondent completes the SSA-8510, either using the paper form or using the Personal Information Authorization Intranet version, SSA uses the form as the authorization to obtain personal information regarding the respondent from third parties until the authorizing person (respondent) withdraws the claim or revokes the permission of its use.

SSA does not use this form to authorize the release of medical or educational records, which are instead addressed through the use of the SSA-827 (0960-0623).

The collection is voluntary; however, failure to verify the individuals' eligibility can prevent SSA from making an accurate and timely decision for their benefits. The respondents are individuals who may file for, or currently receive, Social Security benefits, Supplemental Security Income (SSI) payments, or Medicare Part D subsidies.

3. Use of Information Technology to Collect the Information

This form is available as a print-only, fillable PDF on SSA's website. In addition, SSA created an Intranet version of Form SSA-8510, the Personal Information Authorization screens. This collection does not currently have a fully public-facing Internet version, as we prioritized other information collections for full electronic conversions. Given that IT Mod programming is an ongoing, dynamic project, we cannot provide specific timelines for when we will be able to make any particular ICR available via Internet web-based application. We will ultimately convert most existing ICRs to full electronic versions depending on how they fall within our overall IT Mod schema, but this may be unconnected to the PRA approval lifecycle.

In the interim, we evaluated this collection for conversion to a submittable PDF. Given the high volume of conversions we are coordinating and the more urgent nature of some of the other conversions, we ultimately decided not to prioritize this ICR for conversion to fully submittable PDF at this time. When we are able to schedule this form for conversion to a submittable PDF, we will submit a Change Request to OMB to request prior approval.

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. As stated previously, SSA maintains and uses additional forms for releasing certain types of information that are not handled through the SSA-8510. SSA-827 (OMB Control 0960-0623) is used for authorizing the release of medical

)		(dollars)*	**	
Paper SSA-8510 for general evidence purposes	8,226	1	5	686	\$19.01*	24**	\$75,584***
Personal Information Authorization Intranet Screens for general evidence purposes (SSI Claims System)	192,235	1	5	16,020	\$19.01*	24**	\$1,766,295***
Totals	200,461			16,706			\$1,841,879***

* We based this figure on averaging both the average DI payments based on SSA's current FY 2021 data (<https://www.ssa.gov/legislation/2021FactSheet.pdf>), and the 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 2021 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 (OIRA) 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)****
200,461	1	30	100,231	\$1,905,391

**** 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 time and opportunity cost estimates in the paragraph below.

The total burden for this ICR is **16,706** burden hours (reflecting SSA management information data), which results in an associated theoretical (not actual) opportunity cost financial burden of **\$3,747,270**. SSA does not charge respondents to complete our applications. 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 the 5 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.

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 **\$430,697**. 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	\$184
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	\$370,184

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	\$60,329
Quantifiable IT Costs	Any additional IT costs	\$0*
Total		\$430,697

* 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, as field office 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 13,621 hours. However, we are currently reporting a burden of 16,706 hours. This change stems from an increase in the number of responses from 163,445 to 200,461. 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-8510, 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.

For the Intranet version (SSI Claims System), SSA is not requesting an exception to the requirement to display the OMB approval 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.