

Supporting Statement for the SSA-1199-(Country)
International Direct Deposit
31 CFR 210
OMB No. 0960-0686

A. Justification

1. Introduction/Authoring Laws and Regulations

Section 205(a), of the *Social Security Act (Act)* authorizes the Social Security Administration (SSA) to use Form SSA-1199-(Country) to gather information for directly depositing benefit payments into a beneficiary's account at a financial institution outside the United States. Although the form contains the same generic information for all countries, the bank data varies slightly for each country. Therefore, we gear the form to each specific country for which International Direct Deposit (IDD) is available. We name each form according to the country, such as "SSA-1199-Canada." Each form always contains the same basic request for information. Currently IDD is available in 100 countries. We are working with the U.S. Department of the Treasury to expand IDD to other countries in compliance with Treasury's All-Electronic Payment Initiative. The only authorization SSA needs for countries participating in IDD is permission from the beneficiary to allow SSA to deposit their monthly payments electronically into the bank.

2. Description of Collection

SSA uses Form SSA-1199-(Country) to obtain the direct deposit information for foreign accounts, and enroll Title II beneficiaries residing abroad in IDD. Routing account number information varies slightly for each foreign country, so for each country we use our own variation of the Treasury Department's Form SF-1199A, used to enroll a beneficiary in direct deposit to a U.S. financial institution. The respondents are Social Security beneficiaries residing abroad who want SSA to deposit their Title II benefit payments directly to a foreign financial institution.

3. Use of Information Technology to Collect the Information

SSA did not create an electronic version of form SSA-1199-(Country) under the agency's Government Paperwork Elimination Act (GPEA) plan because legally mandated collections, which are electronic and higher volume, take precedence at this time. However, the paper form is currently available as a PDF on the InForm website and on PolicyNet. We also offer beneficiaries the option of enrolling in IDD through Quick\$tart which we cleared under a separate OMB control number (0960-0564), and we recently added the IDD questions to SSA's iClaim Internet Social Security Benefit Application (0960-0618). However, our current research shows users of the iClaim IDD process continue to use the paper Form SSA-1199-(Country) to aid them while filling out the iClaim Internet screens. Therefore, until further developments with the electronic IDD process to make it easier for Internet users to complete the iClaim screens without the assistance of

the paper form, we will continue to provide the paper form for use in tandem with iClaim IDD responses.

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 we did not use Form SSA-1199-(Country), we would be unable to offer a direct deposit option to beneficiaries living abroad. Since the collection of this information is voluntary, we cannot collect it less frequently. There are no legal or technical 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 November 9, 2018, at 83 FR 56133, and we received no public comments. The 30-day FRN published on January 25, 2019 at 84 FR 371. If we receive any comments in response to this Notice, we will forward them to OMB. SSA did not consult with the public in the revision of this form.

9. Payment of Gifts to Respondents

SSA provides no 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)
SSA-1199-(Country)	13,750	1	5	1,146

The total burden for this ICR is **1,146** hours. We based these figures 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

This collection does not impose a known cost burden on the respondents

14. Annual Cost to the Federal Government

The annual cost to the Federal Government is approximately \$68,000. This estimate accounts for costs from the following areas: (1) designing, printing, and distributing the form; and (2) SSA employee (e.g., field office, 800 number, DDS staff) information collection and processing time.

15. Program Changes or Adjustments to the Information Collection Request

When we last cleared this IC in 2016, the burden was 1,041 hours. However, we are currently reporting a burden of 1,146 hours. This change stems from an increase in the number of responses from 12,500 to 13,750. There is no change to the burden time per response.

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. Exception 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.