

**Supporting Statement for Form SSA-8000-BK
Application for Supplemental Security Income
20 CFR 416.207 & 416.305-416.335, Subpart C
OMB No. 0960-0229**

A. Justification

1. Introduction/Authoring Laws and Regulations

Section 1631(e)(1) of the *Social Security Act (Act)* requires the Commissioner of the Social Security Administration (SSA) to issue regulations on applying for Supplemental Security Income (SSI). SSI is a Federal Income Supplement program funded by general tax revenues (not Social Security taxes). SSI provides aged, blind, and disabled people who have little or no income with the funds for food, clothing, and shelter. Sections 20 CFR 416.207 and 416.305-416.335, *Subpart C*, of the *Code of Federal Regulations* prescribe SSA's authority to collect the information we need to determine an applicant's eligibility for SSI and evaluate payment amounts.

2. Description of Collection

Respondents can apply for SSI by obtaining and completing the SSA-8000-BK application on the paper form, or via personal interview, during which the SSA employee enters the applicant's data directly into the electronic SSI Claims System. SSA uses the information gathered to: (1) determine whether claimants meet all statutory and regulatory requirements for SSI eligibility; and (2) calculate SSI payment amounts. The respondents are SSI applicants, third party individuals assisting respondents completing the form or authorized representatives.

3. Use of Information Technology to Collect the Information

This form is available as a printable fillable PDF on SSA's website. In addition, SSA created an Intranet version of Form SSA-8000-BK, the SSI Claims System screens. Based on our data, we estimate approximately 98% of respondents under this OMB number file for SSI via personal interview while an SSA technician records their answers on the SSI Claims System screens.

This collection does not currently have a fully public-facing Internet version, although SSA is assessing it for electronic implementation as a full Internet application. Since we are currently only in the initial assessment stages, we do not have an estimated time by which we will be able to create an Internet application for this information collection. In addition, SSA is pursuing methods for implementing electronic signatures based on assessments of the risks and benefits associated with the transactions. This form is included in the electronic signature effort in priority order, and if approved by the agency, we will make the signature field fillable. Finally, we are also assessing this form for implementation as a submittable PDF. 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**

We are able to reduce the collection of redundant information by using information in our systems previously provided by the respondent (i.e., date of birth, citizenship, marriage data, contact information). When using a system application to obtain a benefit application, data previously collected will propagate into the claims path for the technician to verify and update when necessary and appropriate.
- 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-8000-BK, the public would have no means to apply for SSI. This would be a violation of regulations at Section *20 CFR 416.207* and *416.305-416.335, Subpart C*. Because we only collect the information once, we cannot collect 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 August 23, 2021 at 86 FR 47190, and we received no public comments. The 30-day FRN published on November 18, 2021 at 86 FR 64585. If we receive any comments in response to this Notice, we will forward them to OMB.
- 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**

Please see the burden chart below:

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 or for Teleservice Centers (minutes)**	Total Annual Opportunity Cost (dollars)***
SSI Claim System	1,646,520	1	35	960,470	\$19.01*	21**	\$29,213,656***
SSA-8000-BK (Paper Form)	705	1	40	470	\$19.01*	21**	\$13,630***
Totals	1,647,225			960,940			\$29,227,286***

* We based this figure by 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 averaging both the average FY 2021 wait times for field offices and teleservice centers, 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	Estimated Total Travel Time to a Field Office (hours)	Total Annual Opportunity Cost for Travel Time (dollars)****

		(minutes)		
1,647,225	1	30	823,613	\$15,656,883

**** 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 **960,940** burden hours (reflecting SSA management information data), which results in an associated theoretical (not actual) opportunity cost financial burden of **\$44,884,169**. 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 35 and 40 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 **\$38,714,457**. 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	\$19,889
Distributing, Shipping, and Material Costs for the Form	Distribution + Shipping + Material Cost	\$317

SSA Employee (e.g., field office, 800 number, DDS staff) Information Collection and Processing Time	GS-9 employee x # of responses x processing time	\$36,133,622
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	\$2,560,629
Quantifiable IT Costs	Any additional IT costs	\$0*
Total		\$38,714,457

* 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 721,609. However, we are currently reporting a burden of 960,940 hours. This change stems from an increase in the number of responses from 1,233,453 to 1,647,225. 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**
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.