

Supporting Statement for Travel Expense Reimbursement
20 CFR 404.999(d) and 416.1499
OMB No. 0960-0434

A. Justification

1. Introduction/Authoring Laws and Regulations

Sections 201(j), 1631(h) and 1817(i) of the *Social Security Act (Act)*, establish travel reimbursement by Federal and State agencies for claimant travel incidental to medical examinations, and to parties; their representatives; and all reasonably necessary witnesses, for travel exceeding 75 miles to attend medical examinations, reconsideration interviews, and proceedings before a judge. 20 CFR 404.999(d)(2) states the Social Security Administration (SSA) or state agency will reimburse you, your representative, or a subpoenaed witness only if the distance from the person's residence or office to the hearing site exceeds 75 miles. 20 CFR 404.999(d) and 416.1499 of the *Code of Federal Regulations* require claimants to submit proof of travel costs for SSA to reimburse them.

2. Description of Collection

Reimbursement procedures are managed by the state-level Disability Determination Services (DDS). Broadly speaking, 20 CFR 404.999(d) establishes that claimants must provide: (1) a list of expenses incurred; and (2) receipts of such expenses. Because of the decentralized nature of this collection, specific requirements related to the provision of receipts, including the acceptability of copies of receipts (as opposed to original) and the means of transmission (for instance, electronic receipts as opposed to physical copies) vary by state. SSA holds the physical policy for state DDSs as we provide the funding; however, the DDSs have their own process, and have the autonomy to operate as they see fit.

SSA does not provide guidance on how recipients itemize their reimbursement claims, and there is no official form that is in use. Reimbursement, and submission of documentation, is done on a state-by-state basis and can vary according to state law and regulation requiring:

- Only an informal statement which itemizes the actual travel costs;
- a formal document (invoice, voucher, etc.); and
- a formal document (invoice, voucher, etc.) only after advance authorization has been given (for those cases where a state DDS decides to give advance authorization).

In some state DDS systems, the respondent can provide the DDS an informal statement which itemizes travel costs, whereas in other DDS systems, a formal document (such as an invoice) must be completed.

Federal and state personnel review the listings and receipts to verify the reimbursable amount to the requestor. The respondents are claimants for Title II benefits and Title XVI payments, their representatives, and witnesses.

3. Use of Information Technology to Collect the Information

As discussed above, implementation of this information collection occurs at the state level. Because of this, the means of acceptable transmission and storage is not decided by SSA beyond what is established in *20 CFR 404.999(d)*. SSA does not provide guidance on how recipients itemize their reimbursement claims, including whether and how electronic systems can be used to improve the facilitation of this information collection. The agency does not have a comprehensive assessment of whether or how state DDSs allow for receipt submission via electronic submission as described under the Government Paperwork Elimination Act. Each DDS is responsible for its own business process for submitting receipts for travel. SSA does not monitor these transactions.

4. Why We Cannot Use Duplicate Information

The nature of the information we collect and the manner in which we collect it preclude 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 collect this information, it could delay reimbursement and result in financial hardship to the claimant. In advance payment cases, it would prevent the claimant from appearing at a medical examination or disability hearing, thus preventing adjudication of the claim. Since we collect the information on an as needed basis, 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 November 30, 2021 at 86 FR 68034, and we received no public comments. The 30-day FRN published on February 7, 2022 at 87 FR 6929. 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

This information collection does not contain any questions of a sensitive nature.

12. Estimates of Public Reporting Burden

Please see the burden chart below:

Regulation Sections	Number of Respondents	Frequency of Response	Average Burden Per Response (minutes)	Estimated Total Annual Burden (hours)	Average Theoretical Hourly Cost Amount (dollars)*	Total Annual Opportunity Cost (dollars)**
20 CFR 404.999(d) & 416.1499	60,000	1	10	10,000	\$19.01*	\$190,100**

* 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).

** 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.**

*** The agency believes that most respondents submit this collection without traveling to a field office. As such, no burden was calculated related to physical transmission of the information.

The total burden for this ICR is **10,000** burden hours (reflecting SSA management information data), which results in an associated theoretical (not actual) opportunity cost financial burden of **\$190,100**. 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 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.

13. Annual Cost to the Respondents (Other)

This collection does not impose a known cost burden to the respondents.

14. Annual Cost To Federal Government

The annual cost to the Federal Government is approximately \$335,000. 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	\$0*
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	\$335,000
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	\$0*
Quantifiable IT Costs	Any additional IT costs	\$0*
Total		\$335,000

* 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 request of this kind, as 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 information collections, 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

There are no changes to the public reporting burden.

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 requirements 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.