

Supporting Statement for Form SSA-11-BK
Request to be Selected as a Payee
20 CFR 404.2001-404.2065, 20 CFR 416.601-416.665
OMB No. 0960-0014

A. Justification

1. Introduction/Authoring Laws and Regulations

Sections 205(j) and 1631(a)(2) of the *Social Security Act (Act)* provide that SSA may certify payment of an individual's claim to a relative or some other person (including an appropriate public or private agency) who is concerned with the welfare of the individual. These sections also require the Social Security Administration (SSA) to investigate before certifying payment to the third party. Sections 20 CFR 404.2001-404.2065 and 416.601-416.665 of the *Code of Federal Regulations* set out procedures and policies for implementing the above sections of the statute. These sections require that the representative payee applicant submit such evidence as SSA may need to establish a relationship to, or responsibility for the care of, the beneficiary. The applicant must also submit information that will help SSA determine if their selection as representative payee is in the recipient's best interest.

2. Description of Collection

SSA requires individuals applying to be representative payees for OASDI or SSI recipients to complete Form SSA-11-BK or, supply the same information to a field office technician through a personal interview. SSA obtains information from applicant payees regarding their relationship to the recipient; personal qualifications; concerns for the recipient's well-being; and intended use of payments if appointed as payee. SSA technicians collect this information during a face-to-face interview with the applicant payee, and input the information into the Electronic Representative Payee System (eRPS). SSA collects the information on paper Form SSA-11-BK if eRPS is not available. The respondents are individuals; private sector businesses and institutions; and State and local government institutions and agencies applying to become representative payees.

3. Use of Information Technology to Collect the Information

SSA created a fillable PDF version of this form for respondents to download, complete, print, and submit to SSA. Per our recent risk assessment, we are not currently able to make the signature line on this form fillable.

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

and intend to make this conversion within the next 3-6 years. Once we have the submittable PDF ready for implementation, we will submit a Change Request to OMB for prior approval.

4. **Why We Cannot Use Duplicate Information**

The nature of the information we are collecting and the manner in which we are collecting it preclude duplication. SSA does not use another collection instrument to obtain similar data.

5. **Minimizing Burden on Small Respondents**

This collection does not significantly 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-11-BK, or its electronic equivalent in the eRPS, SSA might inadvertently select a payee who would not manage the funds in the best interest of the recipient, thereby not meeting the recipient's needs. Because 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 March 30, 2022, at 87 FR 18456, and we received no public comments. The 30-day FRN published on June 1, 2022, at 87 FR 33282. If we receive any comments in response to this Notice, we will forward them to OMB. We did not consult with the public in the maintenance of this form.

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

Individuals/Households (90%)

Modality of Collection	Number of Respondents	Frequency of Response	Average Burden Per Response (minutes)	Estimated Annual Burden (hours)	Average Theoretical Hourly Cost Amount (dollars)*	Average Wait Time in Field Office or Teleservice Centers (minutes)**	Total Annual Opportunity Cost (dollars)***
Representative Payee System (RPS)	1,761,300	1	12	352,260	\$39*	21**	\$37,779,885***
Paper Version	70,452	1	12	14,090	\$39*		\$549,510***
Total	1,831,752			366,350			\$38,329,395***

Private Sector (9%)

Modality of Collection	Number of Respondents	Frequency of Response	Average Burden Per Response (minutes)	Total Annual Burden (hours)	Average Theoretical Hourly Cost Amount (dollars)*	Average Wait Time in Field Office or Teleservice Centers (minutes)**	Total Annual Opportunity Cost (dollars)***
Representative Payee System (RPS)	176,130	1	12	35,226	\$39*	21**	\$3,778,008***
Paper Version	7,045	1	12	1,409	\$39*		\$54,951***
Total	183,175			36,635			\$3,832,959***

State/Local/Tribal Government (1%)

Modality of Collection	Number of Respondents	Frequency of Response	Average Burden Per Response (minutes)	Total Annual Burden (hours)	Average Theoretical Hourly Cost Amount (dollars)*	Average Wait Time in Field Office or Teleservice Centers (minutes)**	Total Annual Opportunity Cost (dollars)***
Representative Payee System (RPS)	19,570	1	12	3,914	\$39*	21**	\$419,796***
Paper Version	350	1	12	70	\$39*		\$2,730***
Total	19,920	1	12	3,984	\$39*		\$422,526***
Grand Total	2,034,847			406,969			\$42,584,880***

* We based these figures by averaging the average hourly wages for Social and Human Service Assistants (<https://www.bls.gov/oes/current/oes211093.htm>); average hourly wages for Lawyers

(<https://www.bls.gov/oes/current/oes231011.htm>); 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#00-0000).

** ** We based this figure on averaging both the average FY 2022 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.**

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)****
1,957,000	1	30	97,850	\$3,816,150****

****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.

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 **12 minutes** shown in our chart above 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 ICR is **406,949**

burden hours (reflecting SSA management information data), which results in an associated theoretical (not actual) opportunity cost financial burden of **\$46,401,030**. 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 \$8,989,304. This estimate accounts for cost 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	\$8,985,884
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	\$3,420
Quantifiable IT Costs	Any additional IT costs	\$0*
Total		\$8,989,304

* 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. In addition, 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 395,116 hours. However, we are currently reporting a burden of 406,969. This change stems from the increase in the number of responses from 1,975,580 to 2,034,847. There is no change to the burden time per response.

*** Note:** The total burden reflected in ROCIS is 2,070,420, while the burden cited in #12 above is 406,969. This discrepancy is because the ROCIS burden reflects the following components: field office waiting time + telephone call system wait times + a rough estimate of a 30-minute, one-way, drive burden. In contrast, the chart in #12 above reflects actual 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**

For the paper Form SSA-11-BK, we will not publish 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.

For the Intranet version of Form SSA-11-BK, 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.