

**Supporting Statement for Form SSA-8001-BK  
Application for Supplemental Security Income  
20 CFR 416.305 - 20 CFR 416.335, Subpart C  
OMB No. 0960-0444**

**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 promulgate regulations concerning applications for Supplemental Security Income (SSI) payments. 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 416.305-416.335 of the *Code of Federal Regulations* provide that we create a prescribed form to collect the information we request for SSI payments.

**2. Description of Collection**

Form SSA-8001-BK to determine an applicant's potential eligibility for SSI. SSA employees collect this information during interviews with members of the public who wish to file for SSI. SSA uses the information for two purposes: (1) to formally deny SSI for non-medical reasons when information the applicant provides results in ineligibility; or (2) to establish a disability claim but defer the complete development of non-medical issues until SSA approves the disability. The respondents are applicants for SSI payments. The paper SSA-8001-BK is designed for a technician to use when they are unable to use the SSI Claims system due to a temporary computer failure or system limitation.

**3. Use of Information Technology to Collect the Information**

In accordance with the agency's Government Paperwork Elimination Act plan Qualified individuals who file online for Social Security Disability Insurance Benefits (DIB) can file for SSI online at the same time through SSA's iClaim application (0960-0618). Submission of the online claim through iClaim (0960-0618) creates a deferred claim in the SSI Claims system and includes only those questions that are common to both DIB and SSI applications. Providing the DIB claim is eligible for a medical determination (i.e., claimant meets insured status), and deferral of non-medical development applies, technicians send both DIB and SSI claims to the staff of the Disability Determination Services (DDS) without collecting the remaining questions for the deferred SSI claim. Medical disallowances are processed without further collection of information from the applicant. For medical allowances, technicians conduct a pre-effectuation review that collects questions from the SSA-8001-BK. Based on our data, we estimate SSA obtains approximately 83% of SSI applications under this OMB number via interview with a technician who uses the SSI Claims System and 18% from online responders using iClaim (0960-0618).

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

When a claimant requires a full SSI application (SSA-8000-BK) after taking a deferred SSI application, technicians change the system entry from deferred to full. The questions the applicant already provided remain while the additional questions for a full SSI application become available to complete. This system functionality avoids collecting duplicate information.

Some of the information we collect with the SSI applications is also information we collect with Title II and Title XVIII benefit applications, representative payee applications, as well as our appointment systems: eLAS and iAppointment. We reduce the collection of this redundant information by integrating Person Information (PI) screens within the SSI Claims path to collect and store person-centric data (i.e., date of birth, citizenship, marriage data, contact information). When using a system application such as the SSI Claims system, person centric data previously collected will propagate into the claims path for the technician to verify and update when necessary and if applicable.

**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-8001-BK, technicians would use Form SSA-8000-BK (0960-0229) to collect this information. Doing so increases the claim interviewing time and burden to the public since the SSA-8000-BK includes developmental questions for determining eligibility and payment amount.

**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**

Modality of Completion	Number of Respondents	Frequency of Response	Average Burden Per Response (minutes)	Estimated Total Annual Burden (hours)	Average Theoretical Cost Amount (dollars)*	Average Wait Time in Field Office or for Teleservice Centers (minutes)**	Total Annual Opportunity Cost (dollars) ***
SSI Claims System	800,963	1	20	266,988	\$19.86*	21**	\$10,869,875***
iClaim and SSI Claims System+	129,736	1	20	43,245	\$19.86*	21**	\$1,760,649***
SSA-8001-BK (Paper Version)	31,776	1	20	10,592	\$19.86*	21**	\$431,240***
<b>Total</b>	<b>962,475</b>			<b>320,825</b>			<b>\$13,061,764***</b>

+ We are not double counting the number of respondents in this ICR, as we do not account for the iClaim respondents under 0960-0618, we only account for them here.

\* We based this figure by averaging both the average DI payments based on SSA's current FY 2022 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](https://www.bls.gov/oes/current/oes_nat.htm)).

\*\* 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**

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:

<b>Total Number of Respondents Who Visit a Field Office</b>	<b>Frequency of Response</b>	<b>Average One-Way Travel Time to a Field Office (minutes)</b>	<b>Estimated Total Travel Time to a Field Office (hours)</b>	<b>Total Annual Opportunity Cost for Travel Time (dollars)*****</b>
962,475	1	30	481,238	\$9,577,387*****

\*\*\*\*\*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.

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 **20** 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. The total burden for this ICR is **320,825** burden hours (reflecting SSA management information data), which results in an associated theoretical (not actual) opportunity cost financial burden of **\$22,639,151**. 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 **\$10,364,303**. This estimate accounts for costs from the following areas:

<b>Description of Cost Factor</b>	<b>Methodology for Estimating Cost</b>	<b>Cost in Dollars*</b>
Designing and Printing the Form	Design Cost + Printing Cost	\$3,321
Distributing, Shipping, and Material Costs for the	Distribution + Shipping + Material Cost	\$0*

Form		
SSA Employee (e.g., field office, 800 number, DDS staff) Information Collection and Processing Time	GS-9 employee x # of responses x processing time	10,357,562
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*
<b>Total</b>		<b>\$10,364,303</b>

\* 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. First, since we work with almost every US citizen, we often do bulk mailings, and cannot track the cost for a single mailing. 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 2019, the burden was 324,539 hours. However, we are currently reporting a burden of 320,825 hours. This change stems a decrease in the number of responses from 973,617 to 962,475. 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.

\*Note: The total burden reflected in ROCIS is **1,138,929**, while the burden cited in #12 of the Supporting Statement is **320,825**. 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 version** of the SSA-8001-BK, 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 **Internet version** of form SSA-8001-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.