

Supporting Statement for Form SSA-624-F5
Representative Payee Evaluation Report
20 CFR 404.2065 and 416.665
OMB No. 0960-0069

A. Justification

1. Introduction/Authoring Laws and Regulations

Sections 205(j)(3) and 1631(a)(2)(c) of the *Social Security Act (Act)* state that the Social Security Administration (SSA) may authorize payment of Social Security benefits, or Supplemental Security Income (SSI) payments, to a relative, another person, or an organization interested in, or concerned about, the welfare of the beneficiary or SSI recipient, when SSA determines it is not in the beneficiary's or SSI recipient's best interest to receive benefits directly. SSA calls these individuals and organizations representative payees. Sections 205(j)(3) and 1631(a)(2)(C) of the *Act* authorize SSA to monitor and verify (in certain situations) how the representative payees use such payments. SSA requires non-exempt representative payees (except State mental institutions participating in SSA's triennial onsite review program) to report to SSA in writing at least once a year to explain how they used and conserved the funds they received. Sections 20 CFR 404.2065 and 416.665 of the *Code of Federal Regulations* authorizes SSA to collect periodic written reports from representative payees.

2. Description of Collection

SSA triggers this collection of information when we are unable to determine the suitability of a representative payee. More specifically, SSA requires our field offices (FO) to conduct a face-to-face interview with representative payees using Form SSA-624-F5 when: (1) SSA finds the payee's responses on SSA-required annual accounting reports [Forms SSA-623, SSA-6230, and SSA-6234 (OMB No. 0960-0068)] unacceptable, and we cannot resolve them; (2) the payee fails to complete SSA's initial and second request for an annual accounting report; or (3) SSA is assessing the representative payee's continued suitability or there was a change in custody. SSA uses the Representative Payee Evaluation Report, Form SSA-624-F5, as a documentation tool for interviews with, and evaluations of, representative payees. In addition to the representative payee, we also interview the beneficiary or SSI recipient, and custodian (if other than the payee) to confirm information the payee provides, and to ensure the payee is meeting the beneficiary's or SSI recipient's current needs (face-to-face interview not required). The FO employee collects and records the responses on the paper form during the interviews. The FO employees then scan the completed form into the Non-Disability Repository for Evidentiary Documents (NDRed) for storage. The respondents are individuals or organizations serving as representative payees for individuals receiving Title II benefits or Title XVI payments who fail to comply with SSA's statutory annual reporting requirement, SSA beneficiaries or recipients, and third-party custodians.

3. Use of Information Technology to Collect the Information

Form SSA-624-F5 is available as a printable fillable PDF. The FO employee collects and records the responses on the form during an interview. Employees then scan the completed form into the Non-Disability Repository for Evidentiary Documents (NDRed) for storage. 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. Given the high volume of conversions we are coordinating and the more urgent nature of some of the other conversions, we ultimately decided not to prioritize this ICR for conversion to fully submittable PDF at this time. 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

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 may affect some small businesses or other small entities. We minimized the burden by carefully reviewing the form and ensuring we ask small businesses and small entities only relevant and necessary questions. We have also minimized the burden by incorporating “yes” and “no” responses where feasible.

6. Consequence of Not Collecting Information or Collecting it Less Frequently

SSA collects accounting information annually from representative non-exempt payees. This statutory requirement is the result of a class action suit filed against SSA (*Jordan v. Bowen*), and therefore, we must collect the information. There is continued Congressional interest on SSA initiatives designed to improve the representative payment monitoring process. For these reasons, we cannot collect the information 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 June 30, 2022, at

87 FR 39153, and we received no public comments. The 30-day FRN published on September 20, 2022 at 87 FR 57551. 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 Amount (dollars)*	Average Wait Time in Field Office (minutes)	Total Annual Opportunity Cost (dollars) *****
SSA-624-F5 (Individuals)	6,537	1	30	3,269	\$28.01*	21**	\$155,652*****
SSA-624-F5 (State and Local Government)	38	1	30	19	\$21.58*	24***	\$734*****
SSA-624-F5 (Businesses)	263	1	30	132	\$14.80*	24***	\$3,508*****
Totals	6,838			3,420			\$159,894*****

* We based these figures on the average U.S. worker's hourly wages (https://www.bls.gov/oes/current/oes_nat.htm), State and Local Government Social and Human Services Assistants (<https://www.bls.gov/oes/current/oes211093.htm>), and Personal Care and Service Workers (<https://www.bls.gov/oes/current/oes399099.htm>), as reported by Bureau of Labor Statistics data.

** We based this figure by averaging the FY 2022 wait times for field offices and teleservice centers, based on SSA's current management information data.

*** We based these figures on the average FY 2022 wait times for field offices, 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 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 (minutes)	Estimated Total Travel Time to a Field Office (hours)	Total Annual Opportunity Cost for Travel Time (dollars)*****
6,838	1	30	1	\$73,509*****

***** We based this dollar amount on by averaging the Average Theoretical Hourly Cost Amounts 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 chart above.

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 **30** 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 **3,420** burden hours (reflecting SSA management information data), which results in an associated

theoretical (not actual) opportunity cost financial burden of **\$233,403**. 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 to the respondents.

14. Annual Cost To Federal Government

The annual cost to the Federal Government is approximately **\$116,657**.

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	\$113,237
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		\$116,657

* 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 2019, the burden was 3,638 hours. However, we are currently reporting a burden of 3,420 hours. This change stems from a decrease in the number of responses from 7,276 to 6,838. 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 **9,246**, while the burden cited in #12 of the Supporting Statement is **3,420**. This discrepancy is because the ROCIS burden reflects the following components: field office and teleservice center waiting times + a rough estimate of a 30-minute, one-way, drive burden. In contrast, the chart in #12 of the Supporting Statement 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

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.