

**Supporting Statement for Form SSA-2574
Information About Joint Checking/Savings Account
20 CFR 416.1201 and 416.1208
OMB No. 0960-0461**

A. Justification

1. Introduction/Authoring Laws and Regulations

Section 1611(a)(1)(B) of the *Social Security Act (Act)* states individuals may be eligible for SSI payments if their resources do not exceed a specified amount. Therefore, when determining eligibility for Supplemental Security Income (SSI), the Social Security Administration (SSA) must determine ownership and value of an applicant's or recipient's resources, including those assets held in financial institution accounts. We use Form SSA-2574, Information About Joint Checking/Savings Account, in resource determinations to develop ownership of funds held in joint accounts. We define resources in 20 CFR 416.1201 of the *Code of Federal Regulations* as "cash or other liquid assets or any real or personal property that an individual (or spouse, if any) owns and could convert to cash to be used for their support and maintenance." Generally, we consider funds in checking and savings accounts to be countable resources of the individuals whose names appear on the accounts. For jointly held accounts, SSA may presume that an applicant or recipient owns all of the funds or an equal share depending on the SSI eligibility of the account owners (20 CFR 416.1208). However, individuals applying for or receiving SSI may rebut this assumption of ownership in a joint account if they submit certain evidence establishing the funds do not belong to them. Section 1631(e) of the *Act*, as amended (42 U.S.C. 1383(e)), authorizes SSA to collect the rebuttal information from SSI applicants and recipients who object to our assumption that they own all or part of the funds in a joint checking or savings account bearing their name.

2. Description of Collection

SSA uses Form SSA-2574 to collect information about checking or savings accounts from both the SSI applicants and recipients, and any other account holder(s) listed on the account. After receiving the completed form, SSA can determine if we should consider the account as a resource for the SSI applicant or recipient. We use Form SSA-2574, as needed, to obtain the information via personal interview, or by mail, from the SSI applicant or recipient, and from the joint owner of the account only when respondents rebut SSA's assumptions about ownership of joint account funds. The respondents may complete the form by themselves or with help from SSA employees. While the form is voluntary, failure to provide the information may result in an unsuccessful rebuttal of account funds ownership. Respondents are SSI applicants and recipients, and individuals who list themselves as joint owners of financial accounts with SSI applicants and recipients.

3. Use of Information Technology to Collect the Information

In accordance with the agency's Government Paperwork Elimination Act plan, we created an Intranet version of Form SSA-2574, on which SSA field office employees record the information in our SSI Claim System while taking the individual's statement during a personal interview. Based on our data, we estimate approximately 75 percent of respondents under this OMB number submit the information via personal interview. We use the paper SSA-2574 for cases we cannot process the information through the SSI Claim System, and in situations where the form is the most efficient means of collecting the information. The paper form is available as a print-only PDF on SSA's internal website. 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 precludes 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, there would be a high risk of incorrect SSI eligibility and payment determinations. Not collecting this information would also prevent us from making accurate determinations regarding eligibility as required by statute. Collection of the information takes place based upon the need of the individual to apply for, or reaffirm eligibility for, SSI; therefore, 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 June 24, 2022, at 87 FR 37899, and we received no public comments. The 30-day FRN published on August 26, 2022, at 87 FR 52605. 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 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)***
SSA-2574 (Paper)	50,000	1	7	5,833	\$19.86*		\$115,843***
SSA-2574 (SSI Claim System)	150,000	1	7	17,500	\$19.86*	21**	\$1,390,200***
Totals	200,000			23,333			\$1,506,043***

* We based this figure by averaging both the average DI payments based on SSA's current FY 2022 data (<https://www.ssa.gov/legislation/2022factsheet.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 by averaging 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.**

NOTE: We did not include travel time as per our current management information data, a majority of respondents complete interviews via telephone, and the remaining respondents submit the paper form to us via mail. Should this change in the future, we will include the language and chart for travel time 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 7 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 23,333 burden hours (reflecting SSA management information data), which results in an associated theoretical (not actual) opportunity cost financial burden of \$1,506,043. 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 \$695,716. 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	\$185
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 7-11 employee average pay x # of responses x processing time	\$692,111
Full-Time Equivalent Costs	Out of pocket costs + Other expenses for providing this service	\$0*
Systems Development,	GS-9 employee x man	\$3,420

Updating, and Maintenance	hours for development, updating, maintenance	
Quantifiable IT Costs	Any additional IT costs	\$0*
Other	[Component may add as needed]	
Total		\$695,716

* 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

There are no changes to the public reporting burden.

Note: The total burden reflected in ROCIS is **75,833**, while the burden cited in #12 of the Supporting Statement is **23,333**. This discrepancy is because the ROCIS burden reflects the following components: field office & teleservice center wait times. 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.