

**Supporting Statement for Centenarian and Medicare Non-Utilization Project Development
Worksheets:
Face-To-Face Interview; Telephone Interview
20 CFR 416.204(b) and 422.135
OMB No. 0960-0780**

A. Justification

1. Introduction/Authoring Laws and Regulations

The Social Security Administration (SSA) documents the results of interviews we conduct for the Centenarian Project and Medicare Non-Utilization Project (MNUP) to determine: (1) whether the respondents are still alive; (2) if they need a representative payee; and (3) if they need a change in representative payee. Sections 205(a) & (b) and 1631(e)(1) of the *Social Security Act*, corresponding to Sections 42 U.S.C. 405 and 42 U.S.C. 1383 of the *United States Code*, give SSA the authority to collect the information. Since these interviews may lead to changes within the recipient's payments, Sections 20 CFR 416.204(b) and 422.135 of the *Code of Federal Regulations* cover reports from beneficiaries and SSA's policies for redeterminations. We require these anti-fraud initiatives to determine whether we are issuing improper payments and whether we need to establish or remove a representative payee.

2. Description of Collection

SSA field office personnel obtain information through personal interviews with Centenarians over age 90, and MNUP beneficiaries, who are those Title II beneficiaries ages 90-99, who show non-utilization of Medicare benefits for an extended period and the absence of private insurance, health maintenance organization, or nursing home, which are all indicators that an individual may be deceased. Our yearly selections identify beneficiaries who are both over age 90 and who do not use their Medicare over a period of time. If Centenarians and MNUP beneficiaries have representatives or caregivers, SSA office personnel invite them to the interviews. During the interview, SSA employees make overall observations of the Centenarians, MNUP beneficiaries, and their representative payees (if applicable). The interviewer uses the appropriate Development Worksheet as a guide for the interview, in addition to documenting findings during the interview. SSA conducts the interviews either over the telephone or through a face-to-face discussion with the respondents either in a field office, or at the Centenarian or MNUP beneficiary's residence. Respondents are MNUP and Centenarian beneficiaries, and their representative payees, or their caregivers.

3. Use of Information Technology to Collect the Information

SSA employees document the outcome of the interviews on the paper Development Worksheets or key them directly into the Centenarian Project and MNUP Websites. We must conduct a telephone interview, or a face-to-face, interview at the Centenarian and MNUP beneficiary's residence or at the field office. SSA employees print the appropriate Development Worksheet from the Centenarian Project and MNUP Website to use during the interview at a respondent's residence. SSA currently has no plans to create a version of the interview questions for the public to complete on their own. As

part of the process for this interview is for the SSA employee to have direct contact with the respondents for observation purposes, the worksheets are meant for the SSA employee to record response and record their own observations. We do not show these worksheets to the respondents, nor do we ask them to fill out anything on the worksheets. SSA is unable to create an Internet version of this information collection, because we need to conduct these interviews in person for observational purposes, and we have already created a website version of the worksheets for SSA employee use only.

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 significantly affect small businesses or other small entities.

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

The consequences of not conducting these interviews are two-fold: (1) SSA would have no means to confirm if the Centenarian or MNUP beneficiary is in need of a representative payee or a change in payee; and (2) SSA would not know if the individual is actually deceased, and someone else is committing fraud by cashing the monthly payment we send. Since we only collect the information once per Centenarian, and only once when the MNUP beneficiary meets all selection criteria, we cannot collect it less frequently. There are no technical or legal obstacles to prevent 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 payment or gifts to the respondents.

10. Assurances of Confidentiality

SSA protects and holds confidential 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

SSA will attempt to contact the remaining 194 Centenarians and approximately 4,210 MNUP beneficiaries in FY 2022. We will schedule a telephone or face-to-face interview when applicable. If our contacts result in a third-party death report, we will verify death and terminate the payment record.

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 or Teleservice Centers (minutes)***	Total Annual Opportunity Cost (dollars)****
Centenarian Project – Title XVI Only*	194	1	15	49	\$28.01**	21***	\$3,277****
MNUP – All Title II Responses	4,210	1	15	1,053	\$28.01*	21***	\$70,781****
Totals	4,404			1,102			\$74,058****

*Some cases are T2 rollovers from prior Centenarian workloads.

** We based this figure on 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 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.**

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:

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)****
4,210	1	30	2,105	\$56,982*****

*****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 **15** 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 **1,102** burden hours (reflecting SSA management information data), which results in an associated theoretical (not actual) opportunity cost financial burden of **\$128,555**. 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 \$1,399,940. 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,	Distribution + Shipping	\$0*

and Material Costs for the Form	+ Material Cost	
SSA Employee (e.g., field office, 800 number, DDS staff) Information Collection and Processing Time	GS-9 employee x # of responses x processing time	\$31,940
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	\$1,368,000
Quantifiable IT Costs	Any additional IT costs	\$0*
Total		\$1,399,940

* 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. 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

Since we only conduct the Centenarian interviews once with respondents who are over age 90, the population that still requires interviews continues to decrease. Currently, our records show we only need to conduct 194 more Centenarian reviews. We consider these remaining 194 Centenarian reviews rollover cases. These rollovers consist of Title II and Title XVI records where SSA staff has not yet made a successful contact that confirms life or death. Upon completion of these rollover cases, we will discontinue the Centenarian Project. We will notify OMB when the remaining 194 Centenarian rollovers are complete, as this will affect the burden information in #12 above. The MNUP will continue as the official Title II replacement for the Centenarian Project. Currently, our records show 4,210 MNUP beneficiaries who require contact. Medicare usage fluctuates yearly, and this influences the number of MNUP respondents. When we last cleared this IC in 2019, the burden of hours was 1,151.75 hours. However, we are currently reporting a burden of 1,102 hours. This change is due to a decrease in the total number of respondents from 4,607 to 4,210. Specifically, there was a reduction in Centenarian respondents who still require an interview from 240 to 194. In addition, there was a slight decrease in the number of MNUP respondents that now require an interview from 4,413 to 4,210. There is no change to the burden time per response.

***Note:** The total burden reflected in ROCIS is **4,404**, while the burden cited in #12 of the Supporting Statement is **1,102**. This discrepancy is because the ROCIS burden

reflects the following components: field office waiting time + 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

SSA is not requesting an exception to the requirement to display an 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.