

**Supporting Statement for
Supplemental Security Income Telephone Wage Reporting and
Supplemental Security Income Mobile Wage Reporting
20 CFR 416.701-416.732
OMB No. 0960-0715**

A. Justification

1. Introduction/Authoring Laws and Regulations

Title II, Sections 205(a) and Title XVI, Section 1631(d)(1) of the *Social Security Act* authorizes the Commissioner of the Social Security Administration (SSA) to conduct quality review processes. Section 20 CFR 416.701- 416.732 of the *Code of Federal Regulations* require Supplemental Security Income (SSI) recipients to report changes such as, changes in income, resources, and living arrangements, which could affect the receipt and amount of their SSI payments. Section 202 of the *Social Security Protection Act (42 USC 902 of the United States Code)* requires SSA to issue receipts to SSI recipients, or their representatives, when they report wages.

The President's *Executive Order 13520* directs agencies to reduce payment errors and eliminate waste, fraud, and abuse in Federal programs; and to use every tool available to identify, and subsequently reclaim, the funds associated with improper payments.

2. Description of Collection

SSA requires SSI recipients to report changes which could affect their eligibility for, and the amount of, their SSI payments, such as changes in income, resources, and living arrangements. SSA's SSI Telephone Wage Reporting (SSITWR) and SSI Mobile Wage Reporting (SSIMWR) enable SSI recipients to meet these requirements via an automated mechanism to report their monthly wages by telephone and mobile application, instead of contacting their local field offices.

The SSITWR allows callers to report their wages by speaking their responses through voice recognition technology, or by keying in responses using a telephone key pad. The SSIMWR allows recipients to report their wages through the mobile wage reporting application on their smartphone. SSITWR and SSIMWR systems collect the same information and send it to SSA over secure channels. To ensure the security of the information provided, SSITWR and SSIMWR ask respondents to provide information SSA can compare against our records for authentication purposes. Once the system authenticates the identity of the respondents, they can report their wage data. The respondents are SSI recipients, deemors¹, or their

¹ Note: Deemors are parents of minor children and spouses of an adult SSI recipient whose earned income SSA deems to belong to the recipient and, therefore, reduces the amount of SSI payment

representative payees².

3. Use of Information Technology to Collect the Information

The SSITWR system collects and transmits data electronically using telephone keypad entry and voice recognition technology. We instruct SSI recipients, deemors, and representative payees (i.e., users or respondents) reporting monthly wages using SSITWR to call an SSA toll-free telephone number allowing them to either speak their responses (voice recognition technology), or key in the information using the touchtone telephone keypad. With SSIMWR, users access the mobile wage reporting application on their mobile device and key in the information required for both authentication and for entering wages. SSITWR and SSIMWR systems collect the same information and send it to SSA over secure channels.

In addition, we allow respondents to submit and check their wage data using our mySocial Security portal under our myWage Report application (OMB Control No. 0960-0808). Through myWage Report, respondents can update their wage data through mySocial Security, as well as review the data they provided through SSITWR or SSIMWR, or through myWage Report. We obtained OMB approval for the authentication for this service through SSA's Public Credentialing and Authentication Process (OMB Control No. 0960-0789). We obtain approval for myWage Report (0960-0808) separately from SSITWR and SSIMWR, as we also use myWage Report for non-SSI (Title II) wage reporting.

In accordance with the agency's Government Paperwork Elimination Act plan, SSA created these electronic versions for wage reporting. Based on our data, we estimate approximately 100% of respondents under this OMB number use the electronic versions.

4. Why We Cannot Use Duplicate Information

We authenticate respondents through telephone speech technology authentication, covered under OMB No. 0960-0596.

SSA also collects information from other sources, such as public and private institutions, employers, and via computer matches with Federal and State agencies. However, to issue SSI payment amounts correctly, in a timely manner, and to prevent potential overpayments, SSA depends primarily on individuals, deemors, and their representative payees to report changes in circumstances when they occur. In addition, as mentioned in #3 above, we also collect this information through the Internet using our myWage Report application (0960-0808); however, myWage Report only covers Internet wage reporting, while SSITWR and SSIMWR covers automated telephone and mobile application reporting. Therefore, we account for the burden for myWage Report separately

² Note: A representative payee is the person, agency, organization, or institution selected to receive and manage payments on behalf of an incapable SSI recipient. This includes a parent who is receiving payments on behalf of a minor.

from SSITWR and SSIMWR.

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, or fail to collect it in a timely fashion, improper wages would continue to be a leading cause of improper payments in the SSI program. Since 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 May 22, 2019, at 84 FR 23623, and we received no public comments. The 30-day FRN published on August 1, 2019 at 84 FR 37704. 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 we collect 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	Number of Responses	Average Burden Per Response (minutes)	Estimated Total Annual Burden (hours)
Training / Instruction*	103,000	1	103,000	35	60,083
SSITWR	26,000	12	312,000	5	26,000
SSIMWR	77,000	12	924,000	3	46,200
Totals	103,000		1,339,000		132,283

*Note: The same 103,000 respondents are completing training and a modality of collection, therefore the actual total number of respondents is still 103,000

The total burden for this ICR is **132,283** hours. We based these figures on current management information data. We did not calculate a separate cost burden.

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 \$400,000. This estimate accounts for costs from the following areas: (1) SSA employee (e.g., field office, 800 number, DDS staff) information collection and processing time; and (2) systems development, updating, and maintenance costs.

15. Program Changes or Adjustments to the Information Collection Request

When we last cleared this IC in 2016, the burden was 108,283. However, we are currently reporting a burden of 132,283 hours. This change stems from an increase in the number of responses from 79,000 to 103,000. 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.

16. Plans for Publication Information Collection Results

SSA will not publish the results of the information collections.

17. Displaying the OMB Expiration Date

SSA is not requesting an exception to the requirement to display the OMB expiration date.

18. Exception 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. Collection of Information Employing Statistical Methods

SSA does not use statistical methods for these information collections.