

**Supporting Statement for Form SSA-4547
Advance Designation of Representative Payee
OMB No. 0960-0814**

A. Justification

1. Introduction/Authoring Laws and Regulations

On April 13, 2018, the President signed into law *The Strengthening Protections for Social Security Beneficiaries Act of 2018*, also known as *Public Law (Pub.L.) 115-165*. Section 201 of the law allows SSA beneficiaries and applicants under Title II, Title VIII, and Title XVI of the *Social Security Act* to designate individuals to serve as a representative payee should the need arise in the future. Section 201(j)(2) of *Pub.L 115-165* provides requirements for selecting a qualified representative payee. *Pub.L 115-165* authorizes the Commissioner of the Social Security Administration (SSA) to offer the option of advance designation only to capable adults and emancipated minors. Beneficiaries who have an assigned representative payee, or have a representative payee application in process, cannot advance designate.

2. Description of Collection

As mandated by *Pub.L 115-165*, SSA created Form SSA-4547, Advance Designation of Representative Payee, and its equivalent Intranet i4547, and Internet electronic versions under SSA's SSI Claims System, Modernized Claim System (MCS), and iMAIN System, to collect the advance designation information from eligible SSA beneficiaries and applicants. Specifically, beneficiaries or applicants use this form, or the accompanying screens, to designate individuals in order of their desired priority, to serve as a representative payee in case they need one in the future. Providing advance designation is voluntary, and respondents can complete this collection by themselves without assistance any time by completing Form SSA-4547, by calling the SSA 800 number, through a personal interview in a Field Office (FO), or online using their *my Social Security* account (OMB Control No. 0960-0789) or the iClaim application (OMB Control No. 0960-0618) to complete the i4547.

Beneficiaries or applicants can update or change the advance designee order of priority at any time. SSA uses the advance designation information to select a qualified representative payee. If the selected representative payee is unable or unwilling to serve, or no longer meets SSA's requirements, SSA will select another representative payee to serve in the beneficiaries and applicant's best interest. SSA will notify beneficiaries annually of the individuals they chose in advance to be their representative payee. Form SSA-4547, and its equivalent electronic modalities, can accommodate up to three advance designees. The respondents are SSA beneficiaries and claimants who want to choose an advance designate representative.

3. Use of Information Technology to Collect the Information

SSA created a paper Form SSA-4547 that is available only on SSA's website as a fillable and printable PDF. SSA only mails the SSA-4547, or gives it as a handout, upon request, to eligible individuals who prefer to provide their advance designation using the paper form. SSA enters the advance designee information from paper forms into an SSA Intranet system (SSI Claims System, MCS, or iMAIN screens). Similarly, if we collect the information via an in-office interview, the SSA field office employees enter the information into an SSA Intranet system.

In accordance with the agency's Government Paperwork Elimination Act plan, SSA created an Internet version of Form SSA-4547, the i4547. The i4547 is accessible through an individual's *my Social Security* account or iClaim application. Based on our data, we estimate approximately 99% of respondents under this OMB number use the electronic version.

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 collect advance designation information using any other methods than those described in this statement.

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-4547, or its electronic modalities, beneficiaries and applicants would not have a method of designating individuals to serve as a representative payee in advance, or a way to indicate their order of priority. Because 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 October 6, 2022, at 87 FR 60721, and we received no public comments. The 30-day FRN published on December 30, 2022, at 87 FR 80574. 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:

Submission of Advance Designation:

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)****
Intranet version (Paper Form SSA-4547, SSI Claims System, MCS, iMain)	473,052*	1	6	47,305	\$19.86**	24****	\$4,697,406*****
Internet version (mySSA)	327,101	1	6	32,710	\$19.86**		\$649,621*****
Internet version (iClaim)	827,257	1	6	82,726	\$19.86**		\$1,642,938*****
Totals	1,627,410			162,741			\$6,989,965*****

* SSA enters advance designation information we receive on the paper Form SSA-4547 in the advanced designation representative payee system using one of the Intranet applications. Accordingly, we have included the paper form responses in this figure for Intranet responses.

Waiver of Advance Designation:

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)****
Intranet version	394,493	1	2	13,150	\$19.86**	24****	\$3,395,007*****

(Paper Form SSA-4547, SSI Claims System, MCS, iMain)							
Internet version (mySSA)	262,996	1	2	8,767	\$19.86**		\$174,113*****
Internet version (iClaim)	657,489	1	2	21,916	\$19.86**		\$435,252*****
Totals	1,314,978			43,833			\$4,004,372*****

Grant Totals:

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)*****
Totals	2,942,388			206,574			\$10,994,337*****

** 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 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 (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)*****
867,545	1	30	433,773	\$8,614,732*****

***** 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 years of conducting this information collection. Per our management information data, we believe that **6** and **2** 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 **206,574** burden hours (reflecting SSA management information data), which results in an associated theoretical (not actual) opportunity cost financial burden of **\$19,609,069**. 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 **\$8,580,542**. 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	\$229,162**

Distributing, Shipping, and Material Costs for the Form	Distribution + Shipping + Material Cost	\$1,566,898***
SSA Employee (e.g., field office, 800 number, DDS staff) Information Collection and Processing Time	GS-9 employee x # of responses x processing time	\$5,972,054
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	\$812,428
Quantifiable IT Costs	Any additional IT costs	\$0*
Total		\$8,580,542

* We have inserted a \$0 amount for cost factors that do not apply to this collection.

** For every advance designation submission or waiver, we mail a receipt to the individual confirming the transaction. Additionally, all beneficiaries who submit an advance designation receive an annual notice of their designees. This figure includes the costs to print the receipts and annual notices.

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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 2020, the burden was **1,173,919** hours. However, we are currently reporting a burden of **206,574** hours. This change stems from a decrease in the number of responses from **11,739,194** to **2,942,388**. In our 2020 clearance package, our burden figures reflected the assumption that all individuals given the option to advance designate, would choose to do so. However, some individuals chose to waive their right to advance designation. The choice to waive the right to advance designation has a lower burden time per response than

the choice to submit an advance designation. Therefore, the initial data was an overestimate on our part, assuming that 100% of eligible claimants and beneficiaries will advance designate. These figures represent current Management Information data.

Note: The total burden reflected in ROCIS is **987,364**, while the burden cited in #12 of the Supporting Statement is **206,574**. 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

Paper Version - SSA-4547:

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.

Internet Version - i4547:

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

Intranet Version - SSA-4547:

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.