# Addendum to the Supporting Statement for Regulatory Changes to

# Expand the Definition of a Public Assistance Household

# 20 CFR 416.1101, 416.1102, 416.1130-416.1148, 416.1160, 416.1201

**OMB No. 0960-NEW**

In the Notice of Proposed Rule Making for this rule, we included the following PRA Statement:

**Paperwork Reduction Act**

These rules do not create any new collections, or require revisions to existing collections, and, therefore, do not require Office of Management and Budget approval under the Paperwork Reduction Act. However, the application of the revisions to these rules may cause burden changes to the collection instruments for the following information collection requests: 0960‑0174, the SSA-8006, Statement of Living Arrangements, In-Kind Support and Maintenance; 0960-0456, the SSA-8011, Statement of Household Expense and Contributions; and 0960-0529, the SSA-5062, Claimant Statement about Loan of Food or Shelter, and the SSA‑L5063-F3, Statement about Food or Shelter Provided to Another. We anticipate a small burden reduction per response for the SSA-8006 (0960-0174) as respondents will not need to develop the responses about their household. In addition, we anticipate a 50% reduction in the number of respondents based on those who indicate they are part of a Public Assistance Household and who may not need to complete the follow-up forms SSA-5062, SSA‑L5063, SSA-8006, and SSA-8011.

The following chart shows the reduction in time burden information associated with the proposed rule:

|  |  |  |  |  |  |  |  |  |
| --- | --- | --- | --- | --- | --- | --- | --- | --- |
| **OMB #; Form #; CFR Citations** | **Number of Respondents** | **Frequency of Response** | **Current Average Burden Per Response (minutes)** | **Current Estimated Total Burden (hours)** | **Anticipated New Number of Respondents Under Regulation** | **Anticipated New Burden Per Response Under Regulation (minutes)** | **Anticipated Estimated Total Burden Under Regulation (hours)** | **Estimated Burden Savings (hours)** |
| 0960-0174  SSA-8006 (Paper Form) | 12,160 | 1 | 7 | 1,419 | 12,160 | 6 | 1,216 | 203 |
| 0960-0174 SSA-8006 (SSI Claims System) | 109,436 | 1 | 7 | 12,768 | 109,436 | 6 | 10,944 | 1,824 |
| 0960-0456 SSA-8011-F3 (Paper Form) | 21,000 | 1 | 15 | 5,250 | 10,500 |  | 2,625 | 2,625 |
| 0960-0456 Personal Interview (SSI Claims System) | 398,759 | 1 | 15 | 99,690 | 199,380 |  | 49,845 | 49,845 |
| 0960-0529  SSA-5062  (Paper version) | 29,026 | 1 | 30 | 14,513 | 14,513 |  | 7,257 | 7,256 |
| 096-0529  SSA-5062  (SSI claim system) | 29,026 | 1 | 20 | 9,675 | 14,513 |  | 4,838 | 4,837 |
| 0960-0529  SSA-L5063  (Paper version) | 29,026 | 1 | 30 | 14,513 | 14,513 |  | 7,257 | 7,256 |
| 0960-0529  SSA-L5063  (SSI claim system) | 29,026 | 1 | 20 | 9,675 | 14,513 |  | 4,838 | 4,837 |
| **Totals** | **657,459** |  |  | **167,503** | **389,528** |  | **88,820** | **78,693** |

The following chart shows the reduction in theoretical cost burdens associated with the proposed rule:

|  |  |  |  |  |  |
| --- | --- | --- | --- | --- | --- |
| **OMB #; Form #; CFR Citations** | **Anticipated New Number of Respondents** | **Estimated Burden Per Response from Chart Above (minutes)** | **Average Theoretical Hourly Cost Amount (dollars)\*** | **Average Combined Wait Time in Field Office and/or Teleservice Centers (minutes)\*\*** | **Anticipated Annual Opportunity Cost (dollars)\*\*\*** |
| 0960-0529  SSA-5062 (Paper version) | 14,513 | 30 | $21.29\* | 24\*\* | $432,506\*\*\* |
| 0960-0529  SSA-5062  (SSI claim system) | 9,675 | 20 | $21.29\* | 24\*\* | $288,373\*\*\* |
| 0960-0529  SSA-L5063  (Paper version) | 14,513 | 30 | $21.29\* | 24\*\* | $432,506\*\*\* |
| 0960-0529  SSA-L5063  (SSI claim system) | 14,513 | 20 | $21.29\* | 24\*\* | $288,373\*\*\* |
| 0960-0174 SSA-8006 (Paper Form) | 6,080 | 6 | $12.81\* | 24\*\* | $109,039\*\*\* |
| 0960-0174 SSA-8006 (SSI Claims System) | 54,718 | 6 | $12.81\* | 24\*\* | $981,310\*\*\* |
| 0960-0456 SSA-8011-F3 (Paper Form) | 10,500 | 15 | $29.76 | 21\*\* | $421,846\*\*\* |
| 0960-0456 Personal Interview (SSI Claims System) | 199,380 | 15 | $29.76 | 21\*\* | $8,010,291\*\*\* |
| Totals | **323,892** |  |  |  | **$10,964,244\*\*\*** |

\* We based this figure on the average DI payments based on SSA's current FY 2023 data (<https://www.ssa.gov/legislation/2023factsheet.pdf>); on the average U.S. citizen’s hourly salary, 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 2023 wait times for field offices and hearings office, as well as by averaging both the average FY 2023 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**.

SSA submitted a single new Information Collection Request which encompasses revisions to information collections currently under OMB Numbers 0960-0174, 0960-0456, and 0960-0529) to OMB for the approval of the changes due to the proposed rule. After approval at the final rule stage, we will adjust the figures associated with the current OMB numbers for these forms to reflect the new burden.  We are soliciting comments on the burden estimate; the need for the information; its practical utility; ways to enhance its quality, utility, and clarity; and ways to minimize the burden on respondents, including the use of automated techniques or other forms of information technology.

As per the above PRA Statement from the NPRM, we are not making any revisions to the forms associated with this rulemaking (0960‑0174, the SSA-8006; 0960-0456, the SSA-8011; and 0960-0529, the SSA-5062, and the SSA‑L5063-F3), as the current forms do not specifically require the respondents to discuss their household situation. Rather, we expect a burden reduction for the respondents of these forms, as we will not require follow up contact with the respondents to further develop the information regarding their households, if they respond on these forms that they receive some kind of public assistance.

Therefore, we are making no changes to the forms themselves; however, we are estimating a reduction in the burden for the SSA-8006 (0960-0174) since respondents will not need to further develop their household situation, if they indicate on the form that they receive public assistance. In addition, we also estimate that approximately 50% fewer respondents will need to complete the follow up forms, SSA-8011 (0960-0456) and SSA-5062, with the cover letter SSA-L5063 (0960-0529) since those respondents will not need to submit further development regarding their households.

We indicated these estimated reductions in the NPRM (chart above), as well as in the Supporting Statement for this rule making.