

**Supporting Statement for Form SSA-6233**  
**Representative Payee Report of Benefits and Dedicated Account**  
**20 CFR 416.546, 416.635, 416.640, 416.665**  
**OMB No. 0960-0576**

**A. Justification**

**1. Introduction/Authoring Laws and Regulations**

Section 1631(a) of the *Social Security Act (Act)* and Sections 20 CFR 416.635 and 416.665 of the *Code of Federal Regulations* state that the Social Security Administration (SSA) can designate a representative payee (payee) to receive payment on behalf of beneficiaries when SSA determines it is not in beneficiaries' best interest to receive their benefit payments directly. Section 1631(a)(2)(C) and 20 CFR 416.665 require certain payees to account annually for how they spent and saved the benefits on the beneficiary's behalf.

Additionally, Section 1631(a) of the Act, and Sections 20 CFR 416.546, 416.640, 416.635 and 416.665 of the *Code of Federal Regulations*, require payees to establish and maintain a separate (i.e., "dedicated") account in a financial institute when a blind or disabled child under age 18 is eligible for certain past-due Supplemental Security Income (SSI) monthly payments, on or after August 23, 1996. Per the regulations, the payee deposits certain subsequent past-due benefits and underpayments into the dedicated account. The Act and our regulations restrict the funds from the account to specific purchases. SSA requires payees with dedicated accounts to report the activity of funds in the account annually, using form SSA-6233, Representative Payee Report of Benefits and Dedicated Account, to ensure deposits and expenditures comply with the law. This reporting requirement remains in effect either until the payee depletes the account, or until SSA terminates eligibility for SSI payments.

**2. Description of Collection**

The Act requires that certain payees provide us with the following information annually: (1) where the beneficiary lived during the accounting period; (2) who made the decisions on how benefits were spent or saved during that period; (3) how the payee or beneficiary used the benefit payments; and (4) how much of the benefit payments were saved and how the savings were invested.

The Act also requires that, effective August 1996, after any Interim Assistance (IA) reimbursement payment or direct payment of representative fees, any payment that exceeds six times the Federal Benefit Rate (FBR) plus any Optional State Supplement (OSS) that is issued to the payee of an eligible individual under age 18 must be paid into a dedicated account at a financial institution. SSA requires the payee to manage the dedicated account in accordance with our rules, including using the funds for permitted expenditures and reporting on the use of funds. When SSA requires a dedicated account, we notify the payee through a mailed notice to inform them of the need to open a dedicated account and of the

rules for managing a dedicated account. After establishing the account, the payee reads and signs an acknowledgement that they understand the dedicated account rules prior to SSA releasing funds into the account.

To implement both of these requirements, SSA requires payees to submit a written report accounting for the use of monthly Social Security or Supplemental Security Income (SSI) payments and funds paid into a dedicated account. SSA uses Form SSA-6233 to: (1) ensure the payee uses monthly payments for the recipient's current needs and properly conserves the remainder; and (2) confirm funds paid into the dedicated account remain are spent and saved in compliance with the law.

Respondents learn of the requirement to establish a dedicated account via Agency mailers. Payees with dedicated accounts must report annually on the activity of funds in the account to ensure deposits and expenditures comply with the law. SSA instructs payees who are exempt from the annual accounting requirement per *20 CFR 416.665* to complete only the portion of the form related to dedicated accounts; they are exempt from completing the portion of the form related to monthly benefit payments. Although we mail a paper form of the SSA-6233 to the payee, the respondent can also complete the report through telephone contact after which an SSA technician mail the report to the payee for signature, or during a face-to-face interview in a field office.

We identified the following psychological costs based on the requirements for this information collection:

- **Psychological Cost:**
  - **Requirement for the Program:** The SSA-6233 requires respondents with dedicated accounts to report annually on the activity of funds in the account to ensure deposits and expenditures comply with the law. This requires payee to explain how or why “other items and services” that are not for medical treatment, education, or job skills training relate to the child's impairment.
  - **Psychological Cost:** The respondent may perceive these questions as unduly invasive and time consuming, and these factors can lead to individuals choosing to delay or abandon completing this form when first received.

While we understand that we request significant amounts of information from the respondents, SSA explains, in the form instructions, that payees are legally required to account for how they used and saved benefits on behalf of the beneficiary. In addition, payees sign an agreement to comply with these requirements prior to receiving the beneficiary's funds. We have taken the psychological cost into account when calculating our burden in #12 below.

Respondents are payees for SSI recipients and concurrent beneficiaries who receive both SSI and Social Security benefits.

**3. Use of Information Technology to Collect the Information**

This form is available as a print-only PDF on SSA's Intranet site. SSA technicians print and mail the form to payees with instructions for completing and returning the form. SSA technicians can also input the information into SSA systems via an in-office interview; however, field office employees must input the information manually. SSA did not create an electronic version of Form SSA-6233 under the agency's Government Paperwork Elimination Act (GPEA) plan because historically fewer than 50,000 respondents complete the form annually. Although the current number of respondents exceeds 50,000, we expect this figure to decrease in the future as case processing times decrease. In addition, while we are looking into alternate means for respondents to submit this information collection, we have not, yet conducted a risk assessment on the form (which we require prior to creating a submittable PDF version, or a full Internet application modality), as we consider this a lower use form. Once we have conducted the risk assessments on higher use forms, we will reconsider assessing this form for an electronic submission option.

**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 affect small businesses or other small entities. However, if we did not impose the burden, we would be unable to obtain annual representative payee reporting from those small businesses or entities, which serve as payees for Social Security recipients. Since this collection of information can affect small businesses serving as representative payees, we minimized the burden by incorporating YES and NO responses where feasible.

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

If we did not use Form SSA-6233, we would have no way of knowing if the payee knowingly made any unauthorized expenditures, constituting a "misapplication" of funds, and we would not know if they are recoverable from the payee on a dollar-for-dollar basis. Because we collect this information annually to avoid fraud and unauthorized expenditures, we cannot collect it less frequently. There are no technical or legal obstacles that 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 September 12, 2024, at 89 FR 74351, and we received no public comments. The 30-day FRN published on November 6, 2024, at 89 FR 88105. 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**

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-6233	68,000	1	15	17,000	\$31.48*	21**	\$1,284,3

\*We based this figure on average U.S. worker’s hourly wages, as reported by Bureau of Labor Statistics data ([https://www.bls.gov/oes/current/oes\\_nat.htm](https://www.bls.gov/oes/current/oes_nat.htm)).

\*\*We based this figure on averaging both the average FY 2024 wait times for field offices (24 minutes) and teleservice centers (19 minutes), 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.**

We calculated the following Learning Cost time burden based on the estimated time and effort we expect respondents will take to learn about this program, its applicability to their circumstances, and to cover any additional research we believe respondents may need to take to understand how to comply with the program requirements (beyond reading the instructions on the collection instrument):

<b>Total Number of Respondents</b>	<b>Frequency of Response</b>	<b>Estimate Learning Cost (minutes)</b>	<b>Estimated Total Annual Burden (hours)</b>	<b>Total Annual Learning Cost (dollars)**</b>
68,000	1	10	11,333	\$356,763*****

\*\*\*\*\*We based this dollar amount on the Average Theoretical Hourly Cost Amount in dollars shown on the burden chart above.

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 learning about the program; receiving notices as needed; reading and understanding instructions; gathering the data and documents needed; answering the questions and completing the information collection instrument; scheduling any necessary appointment or required phone call; consulting with any third parties (as needed); and waiting to speak with SSA employees (as needed). Based on our current management information data, the current burden information we provided is accurate. The total burden for this ICR is 17,000 burden hours (reflecting SSA management information data), which results in an associated theoretical (not actual) opportunity cost financial burden of \$1,641,147. 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 \$488,515. This estimate accounts for costs from the following areas:

<b>Description of Cost Factor</b>	<b>Methodology for Estimating Cost</b>	<b>Cost in Dollars*</b>
Designing and Printing the Form	Design Cost + Printing Cost	\$315
Distributing, Shipping, and Material Costs for the Form	Distribution + Shipping + Material Cost	\$70,000
SSA Employee (e.g., field office, 800 number, DDS staff) Information Collection and Processing Time	GS-9 employee x # of responses x processing time	\$418,200
Full-Time Equivalent Costs	Out of pocket costs + Other expenses for providing this	\$0*

	service	
Systems Development, Updating, and Maintenance	GS-9 employee x man hours for development, updating, maintenance	\$0*
Quantifiable IT Costs	Any additional IT costs	\$0*
<b>Total</b>		<b>\$488,515</b>

\* 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. First, since we work with almost every US citizen, we often do bulk mailings, and cannot track the cost for a single mailing. In addition, it is difficult for us to break down the cost for processing a single form, as field office and State Disability Determination Services 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 **5213**, while the burden cited in #12 of the Supporting Statement is **17,000**. This discrepancy is because the ROCIS burden reflects the following components: field office waiting time + learning costs. 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.