

**Supporting Statement for Changes to the Collection Tools Associated with the Final Rule,  
Changes to the Administrative Rules for Claimant Representation and Provisions for  
Direct Payment to Entities (Marasco Decision)  
20 CFR 404.1703, 404.1705, 404.1707, 404.1720, 404.1730, 404.1735, 404.1740, 416.1503,  
416.1505, 416.1507, 416.1520, 416.1530, 416.1535, 416.1540, and 422.515,  
OMB No. 0960-0832**

**A. Justification**

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

***Introduction***

This Information Collection Request (ICR) seeks Paperwork Reduction Act (PRA) approval for changes to multiple existing OMB-approved information collections (ICs) stemming from an associated final rule, *Changes to the Administrative Rules for Claimant Representation and Provisions for Direct Payment to Entities (Marasco Decision)*. We previously solicited comment on these ICR changes when we published the Notice of Proposed Rulemaking (NPRM)<sup>1</sup> for this final rule. We responded to the comments requesting specific changes to the relevant ICs both in the “Comments and Responses” section of the final rule preamble, and in greater detail in the Addendum to this Supporting Statement.

***Background***

The final rule associated with this ICR enables the Social Security Administration (SSA) to directly pay entities fees we may authorize to their employees, as required by the decision of the United States Court of Appeals for the First Circuit (First Circuit) in *Marasco & Nesselbush, LLP v. Collins*.<sup>2</sup> The rule also requires all entities that want to be assigned direct payment of authorized fees, and all representatives who want to be appointed on a claim, matter, or issue, to register with SSA through the new standardized, registration, appointment, and payment process. In addition, it establishes point of contact (POC) requirements for the entities. Further details follow.

Any person who claims a benefit under our programs may appoint representatives to assist with their claim, and the representatives may seek a fee for the services they provide. The Social Security Administration (SSA) must generally authorize any fee that the representatives want to charge or collect. If we authorize a fee to the representatives, we may also pay that fee directly out of the claimant’s past-due benefits, if the representative meets certain conditions. These representatives may be employed by an entity, but currently, we do not directly pay the entity for work performed by a representative it employs.

In 2017, Marasco & Nesselbush, LLP, a law firm, brought an action in Federal court alleging, among other things, that the law firm’s employees had no direct right to

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<sup>1</sup> [NPRM for the Administrative Rules for Claimant Representation and Provisions for Direct Payment to Entities \(Marasco Decision\)](#).

<sup>2</sup> [Marasco & Nesselbush, LLP v. Collins](#).

authorized fees and that their salaries do not depend on the amount of fees generated by the disability cases in which they act as representatives. On July 16, 2021, the First Circuit issued a decision instructing us to find a “reasonably reliable means for law firms to obtain directly from claimants’ past-due benefits the fee payments that, pursuant to existing SSA and federal tax rules, would be recognized as income to the firms.”

SSA published the Notice of Proposed Rule Making for the Changes to the Administrative Rules for Claimant Representation and Provision for Direct Payment to Entities, which proposed to revise our regulations to enable us to directly pay entities fees we may authorize to their employees, as required by the decision of the United States Court of Appeals for the First Circuit (First Circuit) in *Marasco & Nesselbush, LLP v. Collins*.

Under this final rule, to comply with the *Marasco* decision, we allow representatives to assign their right to receive direct payment of an authorized fee to an entity. If the entity meets applicable conditions explained below, we accept an assignment and certify payment of the authorized fee to the entity. We are changing our regulations under sections 20 CFR 404.1720, 404.1730, 404.1735, 416.1530, 416.1535, and 416.1520 of the *Code of Federal Regulations (Code)* to implement the new definitions and requirements.

#### ***Authoring Regulations***

Prior to the effective date of this final rule, our regulations at sections 20 CFR 404.1703, 404.1705, 404.1713, 416.1503, 416.1505, and 416.1513 of the *Code* established SSA’s requirements for who could be a representative with the agency and request direct payment (using the SSA-1699, Registration for Appointed Representative Services and Direct Payment, OMB No. 0960-0732). Finally, sections 20 CFR 404.1707 and 416.1507, discussed the agency requirements for the appointment of a representative, including information we need from both the representative and the claimant (using the SSA-1696, Claimant’s Appointment of a Representative, OMB No. 0960-0527).

Under this final rule, Administrative Rules for Claimant Representation and Provisions for Direct Payment to Entities (*Marasco*), we are now revising sections 404.1703, 404.1705, 404.1735, 416.1503, 416.1505 and 416.1535 of the *Code* to standardize and explain our registration process, require individuals to register before being able to be appointed as a representative on a claim, require individuals to register first as a representative before being named a POC for an entity, and define POC. We are also revising sections 20 CFR 404.1735 and 416.1535 to establish the criteria for entities to be able to receive fee assignment from a representative, including that we will pay fees assigned to entities exclusively through electronic fee transfer (EFT). Finally, under sections 20 CFR 404.1707 and 416.1507, we are explaining how an individual can be an appointed representative on a claim, such as requiring use of the form SSA-1696. For some sections in the final rule, we previously accounted for the public reporting burdens under the following OMB approved information collections: 0960-0527 (SSA-1696, Claimant’s Appointment of a Representative, which allows an individual to appoint a representative, and requires the representative’s agreement to serve as

representative), 0960-0731 (SSA-1694, Request for Business Entity Taxpayer Information, which requests specific taxpayer data from representatives requesting a fee), and 0960-0732 (SSA-1699, Registration for Appointed Representative Services and Direct Payment, which requires the representatives to prove eligibility when they register with SSA and allows them to request direct fee payment-). However, the final rule also introduces new public reporting burdens under sections *20 CFR 404.1707, 404.1720, 404.1730, 404.1735, 416.1507, 416.1520, 416.1530, and 416.1535*. Therefore, we are accounting for those new burdens under this information collection request. The final rule will also require all representatives, and those entities who will receive direct fee payment through assignment, to register with SSA under sections *20 CFR 404.1705 and 416.1505*, which will increase the burden for the SSA-1699 (0960--0732) and SSA-1694 (0960-0731), respectively. Upon OMB's approval of the final rule, we will incorporate these new burdens under the current OMB approvals for the associated information collections.

For ease of clearance, we are creating a new ICR that includes all relevant existing ICs that we are changing because of the final rule. After OMB approves this ICR, we will submit non-substantive change requests for each separate IC to reflect the changes approved as part of this new, aggregated ICR.

## **2. Description of Collection**

We anticipate this final rule will allow us to conduct business more efficiently because it would allow us to automate more notices, minimize manual errors, properly track transactions and related communications, and improve our sanctions process. We expect that this increased automation would also make the processing of appointments and fee payments more efficient by reducing errors associated with manual actions. In addition, the registration requirement for all representatives to register with us prior to being appointed on any claim would enable us to better track all representatives' actions and conduct on their cases rather than just those who choose to register with us. It would also extend access to our electronic services to more representatives and would enable all registered representatives to access our Electronic Records Express (ERE) system to do business with us. We will use our revised Form SSA-1699, Representative Registration (OMB No. 0960-0732, formerly titled Registration for Appointed Representative Services and Direct Payment) to register all representatives.

The final rule for the Changes to the Administrative Rules for Claimant Representation and Provision for Direct Payment to Entities also contains several new public reporting burdens:

- **20 CFR 404.1707 and 416.1507** – SSA revised these sections to include a requirement for the claimant and their representative to complete and sign SSA's prescribed appointment form. Previously, we did not require the claimant or the representative to use the prescribed appointment form for this action; rather, they could submit a written request of their own.
- **20 CFR 404.1720 and 416.1520** – SSA revised these sections to allow a representative who is eligible for direct payment of an authorized fee to assign the

authorized fee to an entity that is eligible for direct payment. Previously, SSA did not allow the representative to assign the authorized fee to an affiliated entity.

- **20 CFR 404.1730 and 416.1530** – SSA revised these sections to allow a representative to assign direct payment of an authorized fee to an entity, or to rescind an existing assignment, if the representative does so before the date on which SSA notifies the claimant of the first favorable determination or decision.
- **20 CFR 404.1735 and 416.1535** – SSA revised these sections to explain the requirements for an entity’s eligibility for direct payment. The new requirements under which an entity is eligible for direct payment under these revised sections are as follows:
  - (a) has an Employment Identification Number,
  - (b) is registered with us in the manner we prescribe, has not been found ineligible for direct payment,
  - (c) designates and maintains an employee who is a registered representative as a point of contact to speak and act on the entity’s behalf,
  - (d) accepts payment via electronic transfer and conforms to our rules.
 We will update the SSA-1694 (OMB No. 0960-0731) with this new requirement.

To collect this new information, we will revise several of our existing information collections which we use for the appointment of representative process. The relevant ICs include:

ICR Number	SSA Form Number and Name	Description of IC	Description of Respondents
OMB No. 0960-0732	SSA-1699, Representative Registration	Individuals use the SSA-1699 to register with SSA as a representative and to request direct payment of fees. Registered representatives also use the SSA-1699 to submit updated information to SSA’s system.	The respondents are individuals who need to either register with SSA as a representative, or registered representatives who need to update their information in SSA’s system.
OMB No. 0960-0527	SSA-1696, Claimant’s Appointment of a Representative	Disability applicants or recipients and their representatives, use Form SSA-1696 to notify SSA of the appointment of a representative to represent them in their dealings with SSA (or to revoke an appointment of representative or withdraw from the acceptance of an appointment as a representative)	The respondents are disability applicants or recipients, and their appointed representatives (both attorney and non-attorney).
OMB No.	SSA-1694, Entity	Law firms or other business	The respondents are business

ICR Number	SSA Form Number and Name	Description of IC	Description of Respondents
0960-0731	Registration and Taxpayer Information	entities made up of individuals qualified to serve as representatives use the SSA-1694 as part of their registration with SSA to submit taxpayer information for the entity (e.g., name, address, business affiliation, bank account information, etc.). Reporting this information then allows SSA to issue a Form 1099-MISC or 1099-NEC (as necessary) to the business entity for reporting fee amounts of at least \$600 directly paid to their employees. Form SSA-1694 is also one of several forms associated with allowing SSA to pay representatives' fees directly and report the fees to the IRS.	entities and law firms which include attorneys or other qualified individuals as employees or partners who serve as representatives for claimants before SSA.

Below we discuss the revisions associate with the final rule for each of the above-mentioned forms:

**Form SSA-1699 (OMB No. 0960-0731)**

Currently, SSA encourages individuals who represent claimants before the agency to register with us; however, there are some representatives who we do not require to register with us. Under this final rule, we are requiring all individuals to use the SSA-1699 to register as a representative before being appointed to represent a claimant or before being designated a point of contact (POC) by an entity. Registration will continue to be a one-time process. Individuals who register as representatives are responsible for updating their registration with subsequent changes, as necessary.

**Form SSA-1696 (OMB No. 0960-0527)**

Currently, respondents can use Form SSA-1696 to appoint a representative to handle their claim before SSA and name their principal representative, and their selected representative(s) can use the SSA-1696 to indicate whether they will charge a fee, if they waive the fee or direct payment, and to show their eligibility for direct fee payment. In addition, representatives can also use the SSA-1696 to verify whether they remain eligible to represent claimants before SSA; to inform SSA that they waive the fee or any business affiliation; and to assign direct payment of any authorized fee to an entity with which they are affiliated. SSA uses the information on the SSA-1696 to document the

appointment of the representative and recognize the individual named on the notice of appointment as the claimant's representative. SSA also uses this form to collect the representative's business affiliation, and employer for each claim. Under this final rule, an appointed representative may use this form to assign to an affiliate entity direct payment of any authorized fee for representational services. In addition, respondents may use the SSA-1696-SUP1 to revoke their appointment of a representative, and representatives may use the SSA-1696-SUP2 to withdraw their acceptance of the appointment. SSA uses the information on the SSA-1696-SUP1 and SSA-1696-SUP2 to document the revocation and withdrawal of a representative. We mention these forms as they are approved under OMB No. 0960-0527, however, we are not making changes to the supplements with this clearance request.

Users of the form and supplements are applicants for, or recipients of, Social Security disability benefits (SSDI), Supplemental Security income (SSI) payments or anyone pursuing a benefit or invoking a right under SSA programs, who are notifying SSA they have appointed someone to represent them in their dealings with SSA; any attorney or non-attorney representatives who accept or withdraw their appointment and individuals who use one of the supplements to withdraw or revoke their appointment of their representative.

#### **Form SSA-1694 (OMB No. 0960-0732)**

Currently, SSA pays fees directly only to individual attorneys or non-attorneys eligible for direct payment. If the appointed representatives work for an entity, law firm, or other organization, SSA asks them to complete Form SSA-1694 and voluntarily register the organization. With this information, SSA reports the income and issues a 1099-MISC or 1099-NEC as appropriate to the registered individual and registered entity to assist them in meeting their tax reporting obligations.

Under the final rule, in preparation for paying entities directly as required by the First Circuit's decision in *Marasco & Nesselbush, LLP v. Collins and Social Security Administration*,<sup>3</sup> SSA will collect additional information similar to that which we collect on the individual registration Form SSA-1699 to facilitate direct payments and properly report the income. SSA will also ask entities to designate an individual registered as a representative to serve as an entity POC whom the entity will authorize to act on the entity's behalf to assist SSA in resolving fee-related matters, and perform certain duties, such as updating registration and banking information, including maintaining current entity information and responding to SSA's inquiries regarding fee payments. All entities wishing to receive direct payment of authorized fees will need to perform this one-time registration or update any prior registration. Individuals, POCs, and entities are responsible for updating the registration with subsequent changes, as necessary.

Respondents are POCs of entities, including any attorney or non-attorney representatives who may represent the disability applicants or recipients before SSA.

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

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<sup>3</sup> No. 20-1397, 6 F.4th 150 (1st Cir. 2021).

We collect the information from the SSA-1694 (0960-0731) and the SSA-1699 (0960-0732) by fax or efax. We collect the information from the SSA-1696 (0960-0527) through an Internet-accessible, submittable PDF and our ERE system at the hearing and appeals levels. We discuss the modalities in more detail under the specific OMB documentation for each of these information collections. The following chart shows the percentages of responses submitted via electronic means for each IC:

ICR Number	SSA Form Number and Name	Percentage of Electronic Responses
OMB No. 0960-0732	SSA-1699, Representative Registration	<b>100%</b> submitted by the claimant's appointed representative via fax or through efax.
OMB No. 0960-0527	SSA-1696, Claimant's Appointment of a Representative	<ul style="list-style-type: none"> <li>• <b>50%</b> submitted via the SSA's ERE system at the appeals and hearings levels, or via Adobe Sign.</li> <li>• <b>50%</b> submitted via fax or mail.</li> </ul>
OMB No. 0960-0731	SSA-1694, Entity Registration and Taxpayer Information	<b>100%</b> submitted via fax or efax to SSA.

#### 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 not significantly affect small businesses or other small entities.

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

If SSA did not collect the information required by each of these forms, we would be missing critical information for the representative appointment processes. Specifically:

- **0960-0732:** If we did not collect the information on the SSA-1699, SSA would have no means of authenticating representatives; allowing them direct access to beneficiary records; facilitating direct payment of authorized fees to representatives; or issuing the necessary IRS forms.
- **0960-0527:** If SSA does not collect the information identifying each applicant or recipient's representative on the SSA-1696 (0960-0527), SSA could not fulfill its obligations under the *Act* and regulations to recognize an attorney, or other qualified individual, an applicant or recipient named as a representative.
- **0960-0731:** If SSA did not use form SSA-1694 (0960-0731), the appointed representative would be unable to obtain information reported on a form IRS 1099-MISC or on a form IRS 1099-NEC.

Because we collect the information on these forms/applications as necessary, 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**

SSA published a notice of proposed rulemaking (NPRM) in the Federal Register on August 4, 2023, at 88 FR 51747. In response to the NPRM, members of the public submitted multiple comments to SSA regarding the proposed changes to our rules. We outlined these comments and responded to them in the public comment/response section of the final rule’s preamble, and we explained and justified the changes we chose to make to the forms in the Addendum to this Supporting Statement.

SSA published the final rule on August 21, 2024, at 89 FR 67542. If we receive any public comments pertaining to our time estimates or the information collections associated with this rule, we will share them with 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**

These information collections do not contain any questions of a sensitive nature.

**12. Estimates of Public Reporting Burden**

The following chart shows the time burden information associated with the final rule for the public reporting requirements we are revising:

CFR Citations; OMB #; Form #	Description of New Public Reporting Requirement	Number of Respondents	Frequency of Response	Average Burden Per Response (minutes)	Anticipated Estimated Total Burden Under Regulation (hours)
404.1707(a) 416.1507(a)  SSA-1696 (0960-0527)	You [claimant] complete and sign our prescribed appointment form, and	1,100,000	1	7	128,333



CFR Citations; OMB #; Form #	Description of New Public Reporting Requirement	Number of Respondents	Frequency of Response	Average Burden Per Response (minutes)	Anticipated Estimated Total Burden Under Regulation (hours)
<b>Effective Date:</b> December 9, 2024					
404.1707(a) 416.1507(a)  SSA-1696 (0960-0527)  <b>Effective Date:</b> December 9, 2024	Your representative completes and signs our prescribed appointment form, and	1,100,000	1	5	91,667
404.1720(f) 416.1520(f)  SSA-1696 (0960-0527)  <b>Effective Date:</b> December 9, 2024	A representative who is eligible for direct payment of an authorized fee may assign the authorized fee to an entity that is eligible for direct payment	500,000	1	5	41,667*
404.1730(e)(2) 416.1530(e)(2)  SSA-1696 (0960-0527)  <b>Effective Date:</b> December 9, 2024	A representative may rescind an assignment before the date on which we notify you of our first favorable determination or decision.	150,000	1	3	7,500
404.1735 416.1535  SSA-1694 (0960-0731)  <b>Effective Date:</b> September 30, 2024	An entity is eligible for direct payment if the entity: (e) has an Employment Identification Number, (f) is registered with us in the manner we	7,000	1	18	2,100

CFR Citations; OMB #; Form #	Description of New Public Reporting Requirement	Number of Respondents	Frequency of Response	Average Burden Per Response (minutes)	Anticipated Estimated Total Burden Under Regulation (hours)
	<p>prescribe,</p> <p>(g) has not been found ineligible for direct payment,</p> <p>(h) designates and maintains an employee who is a registered representative as a point of contact to speak and act on the entity's behalf,</p> <p>(i) accepts payment via electronic transfer, and conforms to our rules</p>				
<p>404.1705(c) 404.1730(e)(v) 404.1735(b) 416.1505(c) 416.1530(e)(v) 416.1535(b)</p> <p>SSA-1699 (0960-0732)</p> <p><b>Effective Date:</b> September 30, 2024</p>	<p>Your representative(s) must be registered with us in the manner we prescribe before you submit the appointment(s)</p>	<p>15,382</p>	<p>1</p>	<p>20</p>	<p>5,127</p>
<p><b>Totals</b></p>		<p><b>2,872,382</b></p>			<p><b>276,394</b></p>

The following chart shows the theoretical cost burdens associated with the final rule:

OMB #; Form #; CFR Citations	Number of Respondents	Anticipated Estimated Total Burden Under Regulation from Chart Above (hours)	Average Theoretical Hourly Cost Amount (dollars)**	Total Annual Opportunity Cost (dollars)***
404.1707(a) 416.1507(a)  SSA-1696 (0960-0527)  <b>Effective Date:</b> December 9, 2024	1,100,000	128,333	\$13.30**	\$1,706,829***
404.1707(a) 416.1507(a)  SSA-1696 (0960-0527)  <b>Effective Date:</b> December 9, 2024	1,100,000	91,667	\$84.84**	\$7,777,028***
404.1720(f) 416.1520 (f)  SSA-1696 (0960-0527)  <b>Effective Date:</b> December 9, 2024	500,000	41,667*	\$84.84**	\$3,535,028***
404.1730(e)(2) 416.1530(e)(2)  SSA-1696 (0960-0527)  <b>Effective Date:</b> December 9, 2024	150,000	7,500	\$84.84**	\$636,300***
404.1735 416.1535  SSA-1694 (0960-0731)  <b>Effective Date:</b>	7,000	2,100	\$84.84**	\$178,164***

OMB #; Form #; CFR Citations	Number of Respondents	Anticipated Estimated Total Burden Under Regulation from Chart Above (hours)	Average Theoretical Hourly Cost Amount (dollars)**	Total Annual Opportunity Cost (dollars)***
September 30, 2024				
SSA-1699 (0960-0732)	15,382	5,127	\$84.84**	\$434,975***
<b>Effective Date:</b> September 30, 2024				
<b>Totals</b>	<b>2,872,382</b>	<b>276,394</b>		<b>\$14,268,324***</b>

\* This is not additional burden but part of the existing burden for those representatives who complete this instrument but also check the assignment box. We include it here to indicate a change in burden for this regulatory section.

\*\* We based these figures on average Legal Service hourly salary, as reported by Bureau of Labor Statistics data (<https://www.bls.gov/oes/current/oes231011.htm>) and the average DI payments based on SSA's current FY 2024 data (<https://www.ssa.gov/legislation/2024FactSheet.pdf>).

\*\*\* 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 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, as well as anticipated changes due to the final rule. Per our management information data, we believe that the burdens per response for each form shown on the chart above accurately show 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 **276,394** burden hours (reflecting SSA management information data), which results in an associated theoretical (not actual) opportunity cost financial burden of **\$14,268,324**. SSA does not charge respondents to complete our applications.

We anticipate an overall burden increase for the new requirements under this final rule. Upon OMB approval of the final rule, we will update the burden figures for each individual ICR for 0960-0527, 0960-0731, and 0960-0732 to reflect these revised burdens.

**13. Annual Cost to the Respondents (Other)**

These collections do not impose a known cost burden on the respondents.

**14. Annual Cost To Federal Government**

We estimated the annual cost to the Federal government for these forms under their individual OMB numbers. We are providing these figures again for informational purposes.

Description of Cost Factor	Methodology for Estimating Cost	Cost in Dollars Per ICR*
Designing and Printing the Form	Design Cost + Printing Cost	<ul style="list-style-type: none"> <li>•0960-0527: \$0*</li> <li>•0960-0731: \$320</li> <li>•0960-0732: \$1,500</li> </ul>
Distributing, Shipping, and Material Costs for the Form	Distribution + Shipping + Material Cost	<ul style="list-style-type: none"> <li>•0960-0527: \$0*</li> <li>•0960-0731: \$0*</li> <li>•0960-0732: \$0*</li> </ul>
SSA Employee (e.g., field office, 800 number, DDS staff) Information Collection and Processing Time	GS-9 employee x # of responses x processing time	<ul style="list-style-type: none"> <li>•0960-0527: \$376,596,000</li> <li>•0960-0731: \$241,254</li> <li>•0960-0732: \$3,404,258</li> </ul>
Full-Time Equivalent Costs	Out of pocket costs + Other expenses for providing this service	<ul style="list-style-type: none"> <li>•0960-0527: \$0*</li> <li>•0960-0731: \$0*</li> <li>•0960-0732: \$0*</li> </ul>
Systems Development, Updating, and Maintenance	GS-12 employee x man hours for development, updating, maintenance	<ul style="list-style-type: none"> <li>•0960-0527: \$3,420</li> <li>•0960-0731: \$1,368,000</li> <li>•0960-0732: \$3,420</li> </ul>
Quantifiable IT Costs	Any additional IT costs	<ul style="list-style-type: none"> <li>•0960-0527: \$0*</li> <li>•0960-0731: \$0*</li> <li>•0960-0732: \$0*</li> </ul>
<b>Totals</b>		<ul style="list-style-type: none"> <li>•0960-0527: \$376,599,420</li> <li>•0960-0731: \$1,609,574</li> <li>•0960-0732: \$3,409,178</li> </ul>

\* 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. It is difficult for us to break down the cost for processing a single form, as Field Office often process several forms at once. 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 Field Office employee (GS-11) who usually completes this form 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.

Note: We did not list these costs in ROCIS to avoid double counting the cost to the government. Rather, we only list these costs under their individual OMB numbers. Therefore, we will not double-count them in ROCIS now, instead we include them only

under their associated OMB-approved ICRs.

**15. Program Changes or Adjustments to the Information Collection Request**

The final rule increases the overall public reporting burden for these information collections. See question #12 for updated burden figures. As noted in questions #1 and #12 above, upon OMB approval of the final rule, we will update the burden figures in the associated information collections under 0960-0527, 0960-0731, and 0960-0732 to reflect these revised burdens.

**16. Plans for Publication Information Collection Results**

SSA will not publish the results of the information collection.

**17. Displaying the OMB Approval Expiration Date**

For the **paper Forms** SSA-1694, SSA-1696, and SSA-1699, we will not publish 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.

For the **Internet versions** of Forms SSA-1696-APP 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.