Supporting Statement for Beneficiary Recontact Report
Form SSA-1588
OMB No. 0960-0502

A. Justification

1. Introduction/Authoring Laws and Regulations

Section *202(g)(1)* of the *Social Security Act* states that a surviving spouse or surviving divorced spouse of an individual who died and was fully or currently insured is entitled to mother's or father's benefits, as long as this spouse or ex-spouse has an entitled child of the deceased in their care and has not remarried, except for certain situations as outlined in Section *20 CFR 404.341* of the *Code of Federal Regulations*. Sections *20 CFR 404.703* and *20 CFR 404.705* of the *Code of Federal Regulations* authorize the Commissioner of the Social Security Administration (SSA) to request information SSA needs to decide whether entitlement to benefits continues. SSA may stop benefits if we do not receive the requested information for establishing continuing entitlement.

2. Description of Collection

We use the Beneficiary Recontact Program to detect unreported marriages and reports of no child-in-care situations of young surviving spouses which may impact a surviving spouse's continued eligibility for parent's benefits. Young surviving spouses are under age 60 with a Beneficiary Identification Code (BIC) of E (or E followed by a subscript), and meet the requirements outlined in RS 00208.001C. In the past, the Social Security Administration (SSA) relied mainly on voluntary reports of marriage and other events that cause suspension and termination of benefits. Studies show that some young surviving spouses report only when we ask directly, resulting in significant overpayments that often go undetected.

The automated program mails Form SSA-1588-SM (Beneficiary Recontact Report), and a notice to young surviving spouses to determine their continued eligibility. We require all entitled young surviving spouses, with dependent child(ren) in their care, to periodically complete this form to affirm their eligibility. The automated program also sends follow-up mailings to non-responders. If we do not receive a response to the final request notice, the automated program terminates benefits and notifies the young surviving spouse of the action.

Each month the Regular Transcript Attainment and Selection Pass program selects young surviving spouses eligible for the Recontact process based on their date of birth; date of current entitlement; and a notice indicator in the Recontact data line on the Master Beneficiary Record. SSA's Systems then sends a file over to SSA's vendor, who inputs any pre-filled information ,and mails the Form SSA-1588 and the instruction page to the respondent along with a prepaid envelope to mail the form back to SSA. Surviving spouses receive the initial

mailing in the same month in which they first became entitled in year 1, 2, 3, 6, and 9 of their entitlement.
The initial mailing is the first form SSA sends to the beneficiary, and asks the respondents the following questions: 1) if they are married, and, if the respondent selects "yes," we ask for the full name of their spouse, the date of marriage, if their spouse is receiving Social Security benefits, and to provide their spouse's social security number; and 2) if they have children living with them who receive social security benefits, along with a request to provide the dates the child stopped living with them, if applicable. SSA investigates recipients of disability payments to determine their continuing eligibility for payments. Research indicates recipients may fail to report circumstances that affect their eligibility. Two such cases are: (1) When parents receiving disability benefits for their child marry; and (2) the removal of an entitled child from parents' care. SSA uses Form SSA-1588-SM to ask mothers or fathers about both their marital status, and children currently under their care, to detect overpayments and to avoid continuing payment to those no longer entitled. If SSA does not receive a response to the initial mailing, SSA sends a follow-up form labeled final request. SSA's WBDOC staff evaluates the information listed on the form for program compliance. The respondents are recipients of mothers' or fathers' Social Security benefits.

3. Use of Information Technology to Collect the Information

This collection does not currently have a fully public-facing Internet version, as we prioritized other information collections for full electronic conversions. Given that IT Mod programming is an ongoing, dynamic project, we cannot provide specific timelines for when we will be able to make any particular ICR available via Internet web-based application. We will ultimately convert most existing ICRs to full electronic versions depending on how they fall within our overall IT Mod schema, but this may be unconnected to the PRA approval lifecycle. In the interim, we evaluated this collection for conversion to a submittable PDF. Given the high volume of conversions we are coordinating and the more urgent nature of some of the other conversions, we ultimately decided not to prioritize this ICR for conversion to fully submittable PDF at this time. When we are able to schedule this form for conversion to a submittable PDF, we will submit a Change Request to OMB to request prior approval.

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 affect small businesses or other small entities.

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

If we do not use Form SSA-1588-SM to determine if recipients are still eligible to

receive payments, SSA may issue incorrect payments to recipients, possibly causing overpayments. We cannot collect this information less frequently, as we send these as needed within specific years of entitlement to ensure eligibility and avoid fraud. 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 June 30, 2022, at 87 FR 39153, and we received no public comments. The 30-day FRN published on September 20, 2022, at 87 FR 57551. If we receive any comments in response to this Notice, we will forward them to OMB. We did not consult with the public in the revision of this form

9. Payment or Gifts to Respondents

SSA does not provide payment 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 Amount (dollars)*	Total Annual Opportunity Cost (dollars)**
SSA-1588-SM	72,565	1	5	6,047	$29.76*	179,959**

* We based this figure on 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).

** 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. Per our management information data, we believe that the **5** minutes shown in our chart above 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 **6,047** burden hours (reflecting SSA management information data), which results in an associated theoretical (not actual) opportunity cost financial burden of **$169,376**. 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 to respondents.

14. Annual Cost to Federal Government

The annual cost to the Federal Government is approximately $73,649. 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	$10,149
Distributing, Shipping, and Material Costs for the Form	Distribution + Shipping + Material Cost	$43,541
SSA Employee (e.g., field office, 800 number, DDS staff) Information Collection and Processing Time	GS-9 employee x # of responses x processing time	$165,39
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	$3,420
Quantifiable IT Costs	Any additional IT costs	$0*
Total		**$73,649**

* 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

When we last cleared this IC in 2019, the burden was 6,412 hours. However, we are currently reporting a burden of 6,047 hours. This change stems from a decrease in the number of responses from 76,944 to 72,565. 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 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*).