

**Supporting Statement for Form SSA-8508 BK  
Supplemental Security Income (SSI) –  
Quality Review Case Analysis  
OMB No. 0960-0133**

**A. Justification**

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

The Social Security Administration's (SSA), Office of Quality Review (OQR) performs reviews of SSI recipient's cases, using electronic form SSA-8508-BK (or e8508). Authority for quality review (QR) of the Supplemental Security Income (SSI) payment process is in Section 1631(d)(1) of the *Social Security Act (Act)*, which indicates that provisions of Section 205(a) of the *Act* apply under Title XVI to the same extent as under Title II. Section 205(a) of the *Act* specifies the Commissioner of Social Security shall adopt reasonable proper rules and regulations to regulate and provide for the nature and extent of the proofs and evidence, and the methods of taking and furnishing the same, to establish the right to benefits. Section 1631(e)(1)(B) of the *Act* provides the Social Security Administration (SSA) will not determine eligibility for SSI payments solely on declarations by the applicant, but independent or collateral sources will also verify evidence. We will obtain additional information as necessary to assure correct eligibility and payment amount. Section 1611(c)(1) of the *Act* specifies the Commissioner of Social Security may determine eligibility for and the amount of such benefits.

**2. Description of Collection**

To assess the SSI program and ensure the accuracy of its payments, SSA conducts legally mandated periodic SSI case analysis quality reviews. SSA uses Form SSA-8508-BK to conduct these reviews, collecting information on operating efficiency; the quality of underlying policies; and the effect of incorrect payments. SSA also uses the data to determine SSI program payment accuracy rates, which are a performance measure of the agency's service delivery goals.

The following is a description of the process used to conduct this collection:

- a. SSA's Office of Quality Review (OQR) performs these reviews. We select a stratified random sample each month of recipients who received payment during the sample period.
- b. We review the case file prior to contacting the respondent to prepare for the interview, to ensure we address known eligibility factors, i.e., income, resources, and living arrangements, etc., that are specific to the respondent. The case file may be months or years old, and factors of eligibility may have changed since the last agency contact. Our eventual goal when we interview the respondent is to capture and verify current information the recipient provided for the sample period to determine the accuracy of the payment issued and eligibility.

- In preparing the initial letter contacting the respondent, we include a checklist with requested documentation. The number of boxes checked depends on the casefile pre-interview review that the OQR reviewer conducts prior to the interview. For example, if the casefile shows that the individual earned income, we will request that the recipient provide verification, i.e., paystubs in their possession, to verify wage information.

We then send a letter to the selected respondents wherein:

- c. We request that the recipient respond to confirm the phone-based interview appointment.
  - If we do not receive a response, we attempt to contact them on the scheduled date and time.

There are ramifications if the recipient is non-responsive or uncooperative. We request Field Office (FO) assistance to obtain the recipient's cooperation. When OQR requests assistance, the FO attempts to locate the recipient and obtain a promise for future cooperation with the review. If they are unable to locate the recipient, or if the recipient refuses to cooperate, the FO follows due process (advance notice) to suspend benefits.

The current Privacy Act Statement in the appointment letter advises the recipient "Furnishing this information is voluntary. However, failing to provide us with all or part of the information could result in suspension or termination of your benefits."

- d. During the phone-based interview, we redevelop and verify all non-medical factors of eligibility and payment amount. If the recipient does not have the documents we need to verify eligibility and payment amount, we can assist them to obtain the evidence. We can avoid re-contact by addressing any issues related to evidence during the initial phone call.
  - After an interview, the OQR reviewer verifies the recipients' allegations with documents or by contact with a collateral source. There may be follow-up contact with the interviewee, if we do not receive any requested documents; however, we do not require respondents to visit an FO.
  - If we identify an error, we notify the FO to take corrective action. We report the aggregate results to Congress. We do not use the results of the Stewardship review in performance of evaluations of Disability Determination Services or FOs.

During the interview, the OQR reviewer documents responses on the electronic SSA-8508-BK (or e8508), a standalone Excel application that resides in the reviewer's government-issued personal computer. The OQR reviewer uploads the data to our Electronic Quality Assurance (eQA) system. eQA is a separate and independent system

that allows the reviewer to edit the data on an as needed basis, until the review closes or clears the case.

Mandated Quality Reviews are not a separate program but are part of the voluntary SSI assistance program. Respondents learn of SSI Quality Reviews when OQR sends an appointment letter requesting to schedule an interview. Notices i.e., appointment and information request letters include direct contact information for the Office of Quality Review conducting the review, as well as the agency National Toll-Free number.

Current Appointment and Information Request Letters provide contact information and, if approved, revisions will also reference information about OQR on the SSA.gov official website.

SSI stewardship review sampled individuals (respondents) do not complete the form included in this OMB package on their own. Rather, as explained above, OQR reviewers ask sampled individuals questions related to the status of eligibility factors during the review period. Eligibility factors are prone to changes throughout recipients' life.

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

- **Psychological Cost #1:**
  - **Requirement for the Program:** While completing the SSA-8508-BK or e8508 form is voluntary, as per the notice we send to the respondent, if a respondent refuses to respond, or only provides SSA with part of the information, it could result in SSA's suspension or termination of the respondent's benefits.
  - **Psychological Cost:** This implication that non-compliance may result in the loss of benefits may cause some respondents to answer the questions inaccurately (due to fear of the consequences of not responding fully), and may cause others to avoid responding out of fear.
- **Psychological Cost #2:**
  - **Requirement for the Program:** At any time, respondents may refuse to comply with reviews and/or remove themselves from the program, as the information SSA gathers using this form may result in overpayments, or it may find respondents are due refunds or a larger monthly amount.
  - **Psychological Cost:** This may cause some respondent to refuse to complete the review due to fear that incorrect payments may result in an overpayment.

We understand these psychological costs may cause respondents to delay their completion of the information collection or cause them to abandon the information collection entirely. However, we require full completion of this collection to continue to receive benefits.

Therefore, we have taken these potential psychological costs into account when calculating our burden in #12 below

The respondents are recipients of SSI payments selected for the quality reviews.

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

As discussed previously, completion of this ICR involves a phone-based interview wherein the SSA agent records respondent's responses in an electronic version of Form SSA-8508-BK, the e8508 Excel application (which functions via the government-issued personal computer of the SSA staff interviewer). In most circumstances, we also require the respondent to send in supplemental documentation to SSA following the interview. In almost all cases, respondents mail this information to SSA.

Based on our data, we estimate approximately 95% of respondents under this OMB number participate in SSA's use of the electronic version for the personal interviews conducted to obtain responses. In a limited number of circumstances, SSA staff record the responses on paper, when the interviewer is unable to access the electronic version, which can happen on occasion (e.g., in instances of power failure, or hardware issues). When the interviewer records the information using the paper form, SSA uploads it into eQA, and then manually transcribes the information into the electronic version.

We are currently working with our systems partners to convert the current electronic version into a web-based application (available only to our reviewers via Intranet). In addition, our current procedure requires us to conduct this information collection via personal interview. Since the agency is working on new information technology modifications, we expect to explore the expanded use of alternative modalities, such as encrypted email and desktop faxing for sending our initial contact letter. However, this is an effort that has agency-wide implications, and we expect it may be some time before we can make significant changes to our process for this information collection. Currently, this information collection does not allow for electronic submission as described in Government Paperwork Elimination Act (GPEA). For representative payees using the Business Services Online portal (OMB Control No. 0960-0789), SSA is able to disclose the results of the collection electronically as described under GPEA.

4. **Why We Cannot Use Duplicate Information**

Duplication of topic information on Form-SSA-8508-BK is inherent (and necessary) in this process, as respondent's circumstances may change, and we use the data to verify information of record. We conduct a review of the casefile prior to the interview. During the interview, we resolve any allegation that is discrepant with casefile information.

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-8508-BK, we would compromise the agency's ability to monitor the accuracy and effectiveness of the SSI program efficiently. We would have no

way to establish national accuracy rates or to develop profiles for improving the redetermination process without the information gathered on this interview form. In addition, without this information, it would be more difficult to make recommendations for corrective action. Because we collect this information on an as needed basis, 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 March 11, 2025, at 90 FR 11771, and we received one public comment, which we addressed in the Addendum.

SSA published the second Notice on May 21, 2025, at 90 FR 21817 and we received no public comments. We did not consult with the public in the revision of this form.

**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 Wage Amount (dollars)*	Total Annual Opportunity Cost (dollars)**
SSA-8508-BK (paper interview)	215	1	60	215	\$13.30*	\$2,860**
e8508 (electronic)	4,085	1	60	4,085	\$13.30*	\$54,331**
<b>Totals</b>	<b>4,300</b>			<b>4,300</b>		<b>\$57,191**</b>

\* We based this figure on average DI payments, as reported in SSA’s disability insurance payment 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.**

**Wait Time**

As the OQR reviewers set up specific times for these interviews, and initiate the calls with the respondents, we have no wait time for this information collection.

**Drive Time**

Respondents are not required to visit a field office when completing a quality review. SSA employees reach out to respondents via telephone to complete reviews.

**Learning Cost**

Stewardship quality reviews are based on a monthly sample from the SSI payment rolls consisting of recipients in current payment status. SSA initiates the process with a notice, and we include the burden cost for reading the notice in our time estimate above. There are no additional perceived learning costs as recipients have already learned about the SSI program.

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 (MI) data, we believe that **60** 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 **4,300** burden hours (reflecting SSA management information data), which results in an associated theoretical (not actual) opportunity cost financial burden of **\$57,191**. 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 \$1,595,964. 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	\$0*
Distributing, Shipping, and Material Costs for the Form	Distribution + Shipping + Material Cost	\$0*
SSA Employee (e.g., field office, 800 number, DDS staff) Information Collection and Processing Time	GS-9 employee x # of responses x processing time	\$1,577,349

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	\$18,615
Quantifiable IT Costs	Any additional IT costs	\$0*
<b>Total</b>		<b>\$1,595,964</b>

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

Note: Since the most recent revisions to the form, we have not required any additional designing costs. In addition, the technician does not need to print this form, as they typically use the electronic version, e8505 for the interview. In the extremely rare cases when the technician needs to print the form, the technician prints locally. As printing is so rare, we do not account for it here.

SSA is unable to break down the costs to the Federal government further than we already have. In addition, 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**

Previously we reported a burden of 4,600; however, we are currently reporting a burden of 4,300 hours, showing a 300-hour decrease. This decrease is due to a normal fluctuation in the number of SSI cases. To monitor the accuracy and effectiveness of the SSI program efficiently, we need to decrease or increase the number of cases we review for this collection based on the total number of SSI cases. Based on current MI data, we are decreasing the burden at this time. Although the number of responses changed, SSA did not take any actions to cause this change. These figures represent current MI data.

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

We publish a report based on Form SSA-8508-BK findings at the end of each sample period, which is available to the public, upon request, through the Freedom of Information Act. A typical report presents the national payment accuracy rate for the sample period and provides a comparison of the new accuracy rate established for previous periods. It also presents deficiency dollar information by program area, including comparison of current and previous deficiency data.

We break down error data into overpayments and underpayments, and further analyzed in terms of the five eligibility elements most often involved. We make an additional distinction between those deficiencies which should be subject to a high degree of SSA's control, or which result from failure of SSA to discharge its responsibilities properly, and those that result from failure of the recipient to report information fully and accurately to SSA. Finally, we provide specific data about the deficiency's source (e.g., failure to report a change, incorrect determination, systems failure) within each of these two categories of

responsibility.

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

For the paper Form SSA-8508-BK, we do 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 electronic version of Form SSA-8508-BK, e8508, 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).