Supporting Statement for
RSI/DI Quality Review Case Analysis - Sampled Number Holder, Form SSA-2930; RSI/DI Quality Review Case Analysis - Auxiliaries/Survivor, Form SSA-2931; Stewardship Annual Earnings Test Workbook, Form SSA-4659
OMB: 0960-0189

A. Justification

1. Introduction/Authorizing Laws and Regulations

Section *205(a)* of the *Social Security Act (Act)* authorizes the Commissioner of the Social Security Administration (SSA) to conduct the quality review process, which entails collecting information related to the accuracy of payments made under the Old-Age, Survivors, and Disability Insurance Program (OASDI). Sections *228(a)(3), 1614(a)(1)(B)*, and *1836(2)* of the *Act* require a determination of the citizenship or alien status of the beneficiary; this is only one item that we might question as part of the Annual Quality review.

2. Description of Collection

SSA uses Forms SSA-2930 and SSA-2931, to establish a national payment accuracy rate for all cases in payment status, and to serve as a source of information regarding problem areas in the Retirement Survivors Insurance (RSI) and Disability Insurance (DI) programs. We also use the information to measure the accuracy rate for newly adjudicated RSI or DI cases. SSA uses Form SSA-4659 to evaluate the effectiveness of the annual earnings test, and to use the results in developing ongoing improvements in the process. Respondents learn of the possibility for this review via Agency mailers, SSA's general website, from the mySocial Security landing page, as well as from other individuals. SSA is constantly reviewing our outreach tactics to assure maximum exposure and accessibility to necessary individuals. Our website and mailers list the information respondents need to understand and prepare for this review. Respondents receive a notice for a telephone review using the SSA-8553 (Beneficiary Telephone Contact) or notice for a telephone review for the representative payee using the SSA-8554 (Rep Payee Telephone Contact). To help the beneficiary prepare for the interview, we include three forms with each notice: (1) SSA-85 (Information Needed to Review Your Social Security Claim), which lists the information the beneficiary will need to gather for the interview; (2) SSA-2935 (Authorization to the Social Security Administration to Obtain Personal Information), which verifies the beneficiary's correct payment amount, if necessary; and (3) SSA-8552 (Interview Confirmation), which confirms or reschedules the interview if necessary. The respondents are a statistically valid sample of all OASDI beneficiaries in current pay status or their representative payees.

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

- **Psychological Cost #1**:
  - **Requirement for the Program:** The SSA-2930, SSA-2931, and SSA-4659 review process asks individuals to provide some personal information about themselves and usually requires the redevelopment of initial factors of eligibility and entitlement so SSA can determine the accuracy of payments in the Title II program.

  - **Psychological Cost:** The respondent may perceive these questions as unjustifiably invasive, and these factors can lead to individuals choosing to postpone or decline participating in the review.

- **Psychological Cost #2**:
  - **Requirement for the Program:** The SSA-2930, SSA-2931, and SSA-4659 asks individuals to resupply or provide any new evidence to SSA. This review usually requires the redevelopment of initial factors of eligibility and entitlement which supports determination of the accuracy or inaccuracy of payments in the Title II program.

  - **Psychological Cost:** The respondent might perceive that they are distrusted by the agency or may question the legitimacy of the request.

We understand these psychological costs may cause respondents to delay their completion of the information collection, question the legitimacy of the request, or cause them to abandon the information collection entirely. However, we require full completion of this collection to conduct the quality review process. Therefore, we have taken this potential psychological cost into account when calculating our burden in #12 below.

The respondents are individuals currently receiving Social Security benefits, or their representative payees.

3. Use of Information Technology to Collect the Information

While these forms are available as PDF versions on the SSA website, beneficiaries never fill out the forms directly. We collect all of the information on these forms through telephone interviews with the beneficiaries. The SSA employee conducting the interview writes down the answers to the questions directly on the paper form for the telephone interviews. Both the SSA-2930 and SSA-2931 have a fillable signature line that is completed by the reviewer. The SSA-4659 does not have a fillable signature line; however, it is still completed by the reviewer.

This collection does not currently have a fully electronic version, as we prioritized other information collections for full electronic conversions. Given that information technology modernization (IT Mod) programming is an ongoing, dynamic project, we cannot provide specific timelines for when we will be able to make any information collection request (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 Paperwork Reduction Act (PRA) approval lifecycle. In addition, once we do create an electronic version of these forms, we will continue to use them through an interview process, and they will not be self-help forms. This is due to the nature of the quality review process.

4. **Why We Cannot Use Duplicate Information**
   The nature of the information we collect and the manner in which we collect it preclude 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 did not use these forms, SSA would have no way to effectively evaluate and recommend ongoing improvements for the OASDI program. In addition, if we did not collect this information, it would result in insufficient coverage; we would lose data on the effects of policy and program changes; and users of this data (including Congress; SSA; other Federal agencies; the media; and the general public) would have to plan without firm knowledge of program characteristics. Because we only collect the information on an as-needed basis, 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**
   The 60-day advance Federal Register Notice published on April 4, 2025, at 90 FR 14891, and we received no public comments. The 30-day FRN published on June 17, 2025 at 90 FR 25734. 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

As stated in #2 above, we need to ask some questions which some respondents may perceive as sensitive in nature to redevelop the initial factors of eligibility and entitlement so SSA can determine the accuracy of payments in the Title II program. These include questions regarding their wages, employment, military information, and marriage data. As such, this information collection may have psychological costs pertaining to collection of personal questions (which we also discussed in #2 above). However, we must ask these questions to determine the accuracy of payments in the Title II program.

12. Estimates of Public Reporting Burden

The following burden chart shows the estimated annual burden information for each of the information collection instruments we use as part of the RSI/DI Quality Review Case Analysis. We based these figures on our current management information data by estimating the amount of time respondents take to learn about the program; receive notices as needed; read understand instructions; gather the data and documents needed; answer the questions and provide the information to the reviewer documenting the responses on the collection instrument; schedule any necessary appointment or required phone call; consult with any third parties (as needed); and wait to speak with SSA employees (as needed). In addition, we also considered any potential psychological costs associated with completion of this collection when calculating the burden.

Please see the burden chart below:

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)***	**Average Wait Time for Teleservice Call Centers (minutes) ****	**Total Annual Opportunity Cost (dollars)*****
SSA-2930	1,500	1	30	750	$22.39*	180**	$117,548***
SSA-2931	850	1	30	425	$22.39*	180**	$66,610***
SSA-4659	325	1	10	54	$22.39*	180**	$23,039***
SSA-L8553	4,970	1	5	414	$22.39*	180**	$343,104***
SSA-L8554	705	1	5	59	$22.39*	180**	$48,676***
SSA-8552	2,350	1	5	196	$22.39*	180**	$162,238***
SSA-85	3,850	1	5	321	$22.39*	180**	$265,792***
SSA-2935	2,350	1	5	196	$22.39*	180**	$162,238***
SSA-8510[+]	800	1	5	67	$22.39*	180**	$55,236***
Totals	**17,700**			**2,482**			**$1,244,481*****

[+] Note: We also obtain approval for the SSA-8510 under OMB No. 0960-0707. However, here we only account for the burden used as part of the quality review process, and we do not account for the burden associated with the quality review process under 0960-0707.

* We based this figure on the combined average DI payments based on SSA's current FY 2024 data (https://www.ssa.gov/legislation/2024FactSheet.pdf) and 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).

** We based this figure on the average FY 2025 wait times for teleservice centers (180 minutes), based on SSA's current management information data. This figure reflects the data posted on our public facing website (800 number performance | SSA) on the date we submitted this document to OMB. As the figures fluctuate daily, the wait times may be different after that date.

*** 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.**

Note: We conduct this information collection via telephone personal interviews. As we do not conduct these in a field office, we did not calculate a field office travel time for this information collection.

Note: We did not calculate a separate Learning Cost burden, as we account for the learning costs in the chart above through the line items for the SSA-L8553 and SSA-L8554 (telephone contact notices for beneficiaries and representative payees); the SSA-85, Information Needed to Review Your Social Security Claim; SSA-2935, Authorization to the Social Security Administration to Obtain Personal Information; and the SSA-8552, Interview Confirmation. As these notices inform the respondent about this information collection, and help to prepare them for the interview process, we do not account for any separate learning costs.

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 **average burdens shown on the chart above** (**30, 10, and 5 minutes**, accordingly) 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 **2,482** burden hours (reflecting SSA management information data), which results in an associated theoretical (not actual) opportunity cost financial burden of **$1,244,481**. 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 $80,459. This estimate accounts for costs from the following areas:

Description of Cost Factor	**Methodology for Estimating Cost**	**Cost in Dollars***
Designing, Printing, and Distributing the Form	Design Cost + Printing Cost	$759
SSA Employee (e.g., field office, 800 number, DDS staff) Information Collection and Processing Time	GS-9 employee x # of responses x processing time	$76,280
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		**$80,459**

* 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, 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

As we are removing three of the notices we previously used with this collection since we no longer need them, we have revised the burden accordingly from 2,525 hours to 2,482 hours. We discuss the removal of these notices in the Addendum to the Supporting Statement.

* Note: The total burden reflected in ROCIS is **55,582**, while the burden cited in #12 of the Supporting Statement is **2,482**. This discrepancy is because the ROCIS burden reflects the telephone center waiting time (currently 180 minutes). In contrast, the chart in #12 of the Supporting Statement reflects actual burden.

16. Plans for Publication Information Collection Results

SSA's Office of Quality Review prepares and publishes the results of this information collection. See Part B for more information.

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)*.