

**Addendum to Supporting Statement for Forms SSA-7161-OCR-SM and
SSA-7162-OCR SM**

**Report to United States Social Security Administration by Person
Receiving Benefits for a Child or for an Adult Unable to Handle Funds;
Report to United States Social Security Administration
OMB No. 0960-0049**

Term Of Clearance

OMB placed the following Terms of Clearance on this Information Collection when they last approved it on **2/16/23**:

The agency made major revisions to the supporting statement to better explain the information collection, limitations on the ability to electronically submit the information, and burden estimates, among other areas. No later than one year prior to re-submission, the agency will develop and submit a plan to OMB that allows for SSA to roll-out electronic submission of this information collection when SSA requests its triannual renewal. In this proposal, SSA will prioritize leveraging any existing document submission platform to accommodate electronic submission. In developing a mechanism for submitting this collection electronically, the agency will presume that common types of evidence to support proof of address, including copies of prior-year tax return, a non-expired identification card, or recent bills provide an equivalent level of proof of address as its current, mail-based mechanisms.

SSA Response:

The agency encourages online submission of forms as a convenient and efficient way for individuals to access services. However, since the beginning of 2025, a spotlight has been placed on the agency with a targeted focus on fraud to improve program integrity. To accommodate online submission of forms SSA-7161-OCR-SM and SSA-7162-OCR-SM, SSA must make precautions to ensure we consider fraud.

An important hurdle to overcome is how we identify the submitter. Currently, SSA mails the FEQ forms with pre-printed identifying information which is how technicians identify the submitter and process the FEQ form to completion. If SSA accepts electronic submissions at this stage, and forms are made available on the agency's public-facing forms library, they would not include the preprinted identifying information needed for processing. The processing component would therefore need a new way to quickly identify who the submitter is when they receive the form electronically.

Another hurdle identified is functionality between systems. Employees who receive, review, and process completed FEQ responses currently don't have access to the main programs that interface with Upload Documents (Worktrack or TED).

There has not been a workaround to resolving either one these issues affecting identity verification and effective processing of completed FEQs through online submission. However, SSA is working to find solutions to accept electronic submission in the future. We are hoping to resolve this over the next three years, as we implement newer fraud prevention tools.

Minor Revisions to the Collection Instrument

SSA is making the following revisions:

Revisions to the SSA-7161-OCR-SM:

- **Change #1:** On page 1 between questions 7 and 8, we are adding the following instruction: *DO NOT COMPLETE ITEMS 8 THROUGH 10 IF YOU MEET THE CONDITIONS DESCRIBED IN THE INSTRUCTIONS PAGE.*
Justification #1: We are adding the language to satisfy P.L. 115-165, which exempts certain representative payees from the annual accounting requirement.
- **Change #2:** We are revising the Privacy Act Statement on this form.
Justification #2: SSA's Office of the General Counsel is conducting a systematic review of SSA's Privacy Act Statements on agency forms. As a result, SSA is updating the Privacy Act Statement on the form.

Revision to the SSA-7161-INST:

- **Change 3:** We are adding the following language at the bottom of page 1, before Item 8:
Items 8 through 10: Certain representative payees are exempt from the annual accounting requirement and do not have to answer items 8 through 10. Do not answer items 8 through 10 if you are:
 - A natural parent, adoptive parent, or legal guardian of a minor child entitled to benefits and you live in the same household as that minor child; or
 - a natural or adoptive parent of a disabled person entitled to benefits and you live in the same household as that disabled person; or
 - the spouse of a person entitled to benefits.

Justification #3: We are adding the language, because it explanation about which representative payees do not have to complete items 8 through 10 on the SSA-7161-OCR-SM because they are exempt from the annual accounting requirement (pursuant to P.L. 115-165).

Revision to the SSA-7162-OCR-SM:

- **Change #4:** We are revising the Privacy Act Statement on this form.

Justification #4: SSA's Office of the General Counsel is conducting a systematic review of SSA's Privacy Act Statements on agency forms. As a result, SSA is updating the Privacy Act Statement on the form.