

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

A. Justification

1. Introduction/Authoring Laws and Regulations

Sections 203(c) and 203(g) of the *Social Security Act* (*Act*) require the Commissioner of Social Security to make benefit deductions and provide for the Commissioner to impose penalty deductions on benefits of individuals who fail to make timely reports of events that affect their eligibility. Section 205(a) of the *Act* empowers the Commissioner to determine an individual's continuing eligibility for benefits. In addition, the U.S. District Court for the Western District of Oklahoma ordered the Commissioner to obtain universal, mandatory annual accountings from all representative payees (*Jordan v. Heckler, Civ-79-994-W*). Sections 205(j) and 1631(e)(1)(A) of the *Act* establish the requirement for the agency to set up a monitoring system for representative payees, and Section 102 of the *Strengthening Protections for Social Security Beneficiaries Act of 2018* (Public Law 115-165) amends sections 205(j)(3) and 1631(a)(2)(c) of the *Act* to exempt certain representative payees from the accounting requirements.

In accordance with these laws, the Social Security Administration (SSA) uses the SSA-7161-OCR-SM, *Report to United States Social Security Administration by Person Receiving Benefits for a Child or for an Adult Unable to Handle Funds*, and the SSA-7162-OCR-SM, *Report to the United States Social Security Administration* – also known as our Foreign Enforcement Questionnaires (FEQ) – to collect the relevant information about beneficiaries who live outside the United States.

2. Description of Collection

U.S. citizens and noncitizens who meet certain eligibility requirements can receive Old-Age, Survivors and Disability Insurance (as defined under Title II of the Social Security Act) benefits while living abroad. As of SSA's last review in 2025, there were approximately 841,600 beneficiaries residing in foreign countries. They received about \$677 million in monthly benefit payments (about \$8.1 billion annually). In addition, representative payees were serving about 25,550 beneficiaries residing in foreign countries.

We regularly mail the form to beneficiaries living abroad (or their representative payees) to ensure they are alive and to determine whether there have been any events that may result in suspension, reduction and termination of benefits (such as a change in citizenship, work status, marriage, or divorce). The agency sends beneficiaries receiving their own benefit payments an SSA-7162 annually or biennially, depending on their age, country of residence, and benefit type. Beneficiaries whose circumstances are more likely to change or who may face greater challenges with

timely reporting receive the form annually, whereas those whose circumstances are less likely to change receive it biennially.

We annually send representative payees of beneficiaries living abroad an SSA-7161 to complete on behalf of the overseas beneficiary they serve. In addition to the information the SSA-7162 collects, the SSA-7161 also collects annual representative payee accounting information, which statutorily requires SSA to collect for fraud prevention purposes. [Information collections related to U.S.-based representative payees are covered under separate OMB control numbers: OMB 0960-0068 (includes the SSA-623, SSA-6230 and SSA-6234), OMB 0960-0576 (includes SSA-6233), and OMB 0960-0069 (includes the SSA-624).]

SSA mails the forms on an annual cycle. First, in June or July of each year, we send an initial copy of the form, along with instructions that state SSA requires the representative payee to complete and return the form within 60 days. In October, we then mail an additional copy to individuals who have not returned the first form, yet. Finally, if we still do not receive the form by the end of December, we mail a suspension notice to non-responders in January indicating that their benefits will stop with the February payment (for January benefits), unless we receive their responses.

Upon receipt of a completed form, we review the responses to the questions that solicit information about factors of entitlement to Social Security (e.g., marital status, earnings or self-employment, death, etc.) to decide whether to continue, change, suspend, or terminate benefits.

Based on FY 2023, FY 2024, and FY 2025 data, 10.5 percent of SSA-7162-OCR-SM respondents and 15.1 percent of SSA-7161-OCR-SM respondents failed to complete and return their form, resulting in benefit suspensions.

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

- **Psychological Cost #1:**
 - **Requirement for the Program:** Forms SSA-7161 and SSA-7162 ask individuals to provide some personal information about themselves so SSA can determine whether they remain entitled to benefits and eligible for their current payment amount.
 - **Psychological Cost:** The respondent may perceive these questions as unduly invasive, and these factors could lead to individuals choosing to delay or abandon completing this form.

We understand this psychological cost 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 this potential psychological cost into account when calculating our burden in #12 below.

The respondents are individuals living outside the United States who are receiving benefits on their own (in the case of SSA-7162-OCR-SM) or Representative payees who receive Title II benefits on behalf of a beneficiary who lives outside the United States (for the SSA-7161-OCR-SM).

3. Use of Information Technology to Collect the Information

SSA currently uses a mail-based process to collect the information. We mail paper forms, which respondents complete, sign, and return by mail in a prepaid return envelope for scanning and processing at a central SSA facility.

As of August 2025, SSA began allowing respondents to complete and sign their form over the telephone using the agency's telephone identity verification and signature attestation processes. When the respondents calls to complete the forms, field office or FBU technician records the respondent's answers on a paper form, annotates the form is complete and signed by attestation, and then sends the form to our processing center (following the same process as if they had received a completed form by mail). Although we prefer the respondent to mail the form back to SSA, we expect the percentage of telephone percentage to rise considerably in the future. We estimate that 0.5% of respondents use this method.

SSA is unable to create an electronic version of this information collection at this time, as we send this agency-initiated application to respondents with pre-filled information. We also include a bar code which allows us to scan the completed form into the electronic folder once we receive it from the respondent. Currently, we do not have any means to pre-fill information and send the individualized forms to the respondents electronically, as that would require us to build a new system, and we do not have the resources and manpower to do that at this time. In addition, we cannot send these via email, as the pre-filled information contains personal identifying information (PII) of the respondents, and email is a non-secured means of transferring PII. We will reassess our ability to create an electronic version of this collection if and when technological advances are created that would allow for us to make this collection available via the Internet in a fully secure way.

Additionally, it has historically been SSA's position that collecting the information electronically would not provide satisfactory evidence of a respondent's residence. Allowing respondents to complete their form online could sacrifice our primary way of ensuring that beneficiaries abroad live where they claim to live, putting the integrity of our program at risk.

However, due to frequent global mail service disruptions, we are exploring alternative ways to collect the information. We may also reconsider an electronic version of the forms, which could only be submitted by an authenticated mySSA online account user, and allow the forms to be signed electronically. However, such changes have

not been made as of the writing of this submission. If we schedule the forms 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 preclude duplication. SSA does not use another instrument to obtain similar data from respondents residing in foreign countries.

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

Forms SSA-7161-OCR-SM and SSA-7162-OCR-SM gather information about events and changes in circumstances that might affect entitlement to Title II benefits, or eligibility for payment of such benefits, for beneficiaries living outside the United States. By not sending the forms, or sending them less often, we would be less likely to learn about such events and changes in circumstances since it is more difficult for beneficiaries abroad to self-report them. This could result in improper payments.

Additionally, the SSA-7161-OCR-SM serves a secondary function as our mechanism for gathering representative payee accounting information, which statutorily requires SSA to do on an annual basis. We would be out of compliance if we did not collect the information on an annual basis.

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 August 29, 2025, at 90 FR 42294, and we received no public comments. The 30-day FRN published on December 17, 2025, at 90 FR 58678. 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. We did not consult with the public in the revision/maintenance 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 Cost Amount (dollars)*	Average Wait for Teleservice Centers (minutes)**	Total Annual Opportunity Cost (dollars)**
SSA-7161-OCR-SM	6,077	1	15	1,519	\$32.66*	53**	\$224,929**
SSA-7162-OCR-SM	352,956	1	5	29,413	\$32.66*	53**	\$341,191**
Totals	359,033			30,932			\$ 566,120**

* We based this figure on average U.S. worker's hourly wages as reported by Bureau of Labor Statistics data ([Occupational Employment and Wage Statistics](#)).

** We based this figure on the average combined FY 2026 wait times for teleservice centers (53 minutes which includes the average speed of answer of 12 minutes as well as the average 41-minute wait time for a call back from an SSA technician), based on SSA's current management information data. This figure reflects both data from our systems and the data posted on our public facing website ([Social Security performance | SSA](#)) on the date we drafted this document. As the figures fluctuate daily, the wait times may be different on the website than they appear here. We continue to monitor our website and management information data on call back times to ensure we report updated figures when possible.

** 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 calculated the following Learning Cost time burden based on the estimated time and effort we expect respondents will take to learn about this program, its applicability to their circumstances, and to cover any additional research we believe respondents may need to take to understand how to comply with the program requirements (beyond reading the instructions on the collection instrument):

Total Number of Respondents	Frequency of Response	Estimated Learning Cost (minutes)	Estimated Total Annual Burden (hours)	Total Annual Learning Cost (dollars)***

359,033	1	30	179,517	\$5,863,025***
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***We based this dollar amount on the Average Theoretical Hourly Cost Amount in dollars shown on the burden chart above.

NOTE: We included the total opportunity cost estimate from this chart in our calculations when showing the total time and opportunity cost estimates in the paragraph below.

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 **5** and **15** minutes above 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 **30,932** burden hours (reflecting SSA management information data), which results in an associated theoretical (not actual) opportunity cost financial burden of **\$6,873,265**. 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 the respondents.

14. Annual Cost To Federal Government

The annual cost to the Federal Government is approximately \$702,147. 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	\$975
Distributing, Shipping, and Material Costs for the Form	Distribution + Shipping + Material Cost	\$85,900
SSA Employee (e.g., field office, 800 number, DDS staff) Information Collection and Processing Time	GS-7 employee x # of responses x processing time	\$611,852
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		\$702,147

* 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 to process a single form, and the time it takes to do so can vary greatly based on the form's responses. 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 2023, the burden was 46,116. However, we are currently reporting a burden of 30,932. This change stems from a decrease in the number of responses from 468,762 to 359,033. There is no change to the burden time per response. SSA did not take any actions to cause this change.

*** Note:** The total burden reflected in ROCIS is 527,595, while the burden cited in #12 of the Supporting Statement is 30,932. This discrepancy is because the ROCIS burden reflects the following components: teleservice center waiting time + learning costs. In contrast, the chart in #12 of the Supporting Statement reflects actual burden.

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).

B. Collections of Information Employing Statistical Methods

SSA does not use statistical methods for this information collection.