Addendum to the Supporting Statement Form SSA-4640
Authorization for the Social Security Administration to Obtain Account Records from a Financial Institution and Request for Records (Medicare)
20 CFR 418.3420
OMB No. 0960-0729

Revisions to the Collection Instrument

We are making the following revisions to the paper SSA-4640:

- **Change #1**: We are revising the Privacy Act Statement on this form.

  Justification #1: SSA's Office of Law and Policy 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 this form.

Terms of Clearance

OMB placed the following Terms of Clearance on this Information Collection when they last approved it on 6/14/23:

Term: The agency made minor modifications to the supporting statement to clarify operation of the collection and to increase the burden estimate. Prior to reapproval, the agency will brief OMB on opportunities to use Access to Financial Institutions (AFI) to facilitate this information collection.

- **Term #1:** The agency made minor modifications to the supporting statement to clarify operation of the collection and to increase the burden estimate.

  SSA response #1: As per OMB's request, SSA made minor modifications to the Supporting Statement to clarify the operation of the collection and increase the burden estimate prior to the previous approval. We have kept these revisions in the Supporting Statement we submitted for renewal.

- **Term #2:** Prior to reapproval, the agency will brief OMB on opportunities to use Access to Financial Institutions (AFI) to facilitate this information collection.

  SSA response #2: While we were unable to brief OMB prior to beginning the next PRA approval cycle, we are including an explanation of the issues with using AFI to facilitate the information collection for the SSA- 4640:

Due to legal, regulatory, and contracting issues, we are unable to leverage AFI for Medicare Low-Income Subsidy (LIS) determinations. Currently, we contract AFI only for use in SSI claims and Title II/Title XVI waiver decisions. We cannot apply the AFI program to LIS determinations unless we make changes to the law expanding the program to LIS applications and revise the agency's regulations, POMS and application forms. Finally, the current AFI contract also has a projected maximum volume of requests that does not include LIS applications and adding the LIS applications would cause the volume to exceed the contract maximum, invalidating the contract.