Supporting Statement for Form SSA-9584-BK
State Mental Institution Policy Review Booklet
20 CFR 404.2035, 404.2065, 416.635 and 416.665
OMB No. 0960-0110

A. Justification

1. Introduction/Authoring Laws and Regulations

Sections *205(j)(3)(B)* and *1631(a)(2)(C)* of the *Social Security Act (Act)* require the Commissioner of the Social Security Administration (SSA) to establish a system of accountability monitoring for institutions in each state (there are no regulations implementing these statutory requirements). These institutions serve as representative payees for Social Security beneficiaries. SSA monitors these institutions by collecting information using the State Mental Institutions Policy Review Booklet, Form SSA-9584-BK. Regulations at *20 CFR 404 Subpart U*, Representative Payment (Title II), and *20 CFR 416 Subpart F*, Representative Payment (Title XVI), of the *Code of Federal Regulations*, provide the principles and procedures that SSA follows when determining whether to make representative payment and in selecting a representative payee. These regulations also explain the responsibilities of the representative payee. Specifically, regulations at *20 CFR 404.2035* and *404.2065* (Title II) and *20 CFR 416.635* and *416.665* (Title XVI) explain the representative payee reporting responsibilities.

2. Description of Collection

SSA makes annual grants to the Protection and Advocacy Agencies (P&A) in each state to conduct, for SSA, all representative payee reviews. The collection of this information is mandatory for the completion of onsite reviews of State mental institutions. State mental institutions learn about the State mental onsite program from SSA staff, our website, and other state mental institution.

The P&As use Form SSA-9584-BK to collect information during State mental institutions onsite reviews. The P&As use the SSA-9584-BK to: (1) to determine if the policies and practices of a State mental institution acting as a representative payee for SSA beneficiaries conform to SSA's regulations in the use of benefits; (2) to confirm that institutions are performing other duties and responsibilities required of representative payees; and (3) as the basis for conducting onsite reviews of the Institutions and preparing subsequent reports of findings. More specifically, we request Part A of the form to verify that SSA has the most up to-date information about the facility and the correct contact person. We request Part B if the organization has a previous copy of the form completed during the last SSA onsite review and there are changes to some of the questions in the previous form. The information we collect in Part C of the form deals with the reimbursement procedures the facility has based on State policies. The facility enters in agreements with the State and follows the State policies for reimbursement for the services they provide to the beneficiaries. P&As complete

Part C of the SSA 9584-BK in all State Mental Site Reviews. Part C information is easily available to the organization as part of doing business with the State.

If a copy of a complete SSA-9584-BK from the last State Onsite review is available, we do not require the state agency or institution to complete the entire form. Rather, the state agency or institution has the option of either certifying that the information on the previous SSA-9584-BK is: (1) correct entirely; or (2) is correct except for a few changes. The state agency or institution includes a copy of the previously completed SSA-9584-BK and the completed areas of the current SSA-9584.

The State mental onsite program has been in operation since 1970, and there is broad awareness of its existence among state mental institutions. Participation in the is voluntary. Institutions that participate in the program are reviewed at least once every three years.

On FY 2025 the P&As completed 77 State Mental reviews, 14 of those reviews were initiated in FY 2224 and completed in FY 2025. Of the 77 State Mental reviews finished, we identified 52 total reviews with at least one deficiency, 40 of which were identifiable from responses on the SSA-9584. Of the 96 total individual deficiencies found on the 77 reviews, 47 (49%) were identifiable from the SSA-9584.

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

Psychological Cost #1:

- **Requirement for Program:** SSA uses Form SSA-9584-BK to evaluate the performance of State mental institutions that serve as representative payees for Social Security beneficiaries and SSI recipients. SSA uses the information from the collection to determine whether an institution is fulfilling its representative-payee responsibilities and to identify any issues or areas for improvement. The form supports SSA's monitoring and compliance activities and is required to complete onsite reviews.

- **Psychological Cost:** Respondents may experience a limited degree of stress or concern when completing Form SSA-9584-BK because SSA uses the information to assess the institution's compliance with representative-payee requirements. Institutions may be concerned that SSA could identify deficiencies in their management of beneficiaries' funds, recordkeeping practices, or reporting procedures. Respondents may also experience concern about the potential need to take corrective action or the possibility that SSA could remove the institution as representative payee if SSA identifies serious noncompliance.

SSA staff will review the completed SSA-9584 form to assess how the

representative payee is managing the beneficiary's funds and fulfilling their responsibilities. If the institution is found to be compliant, no further action may be required, but if issues or deficiencies are identified, SSA will require corrective actions, or, in serious cases, remove the payee and appoint a new one. Therefore, we have taken this potential psychological cost into account when calculating our burden in #12 below.

The respondents are State mental institutions serving as representative payees for Social Security beneficiaries and Supplemental Security Income (SSI) recipients.

3. Use of Information Technology to Collect the Information

SSA is unable to create an Internet version of this information collection because the use of the SSA-9584-BK is now limited to the P&As. The Agency provides annual grants to the P&As in each state to conduct, on behalf of SSA, all representative payee reviews. The costs of printing and mailing this collection are covered by the grants. In addition, we evaluated this collection for electronic submission, and found it is not suitable for that process either because the respondents returned the completed collection to the P&As not the Agency. Finally, use of this collection has declined to approximately 63 responses annually. Because of these reasons, we do not currently have a fully public-facing Internet version of this information collection.

We are working with the team developing the agency's online processes for completing and uploading forms and they expect to have functionality available to support several more forms in the next 3-6 years. Therefore, we intend to make this available online for electronic submission in 3-6 years, as soon as possible considering supporting functionality, prioritization, and resources. Once the electronic submission version of the form is ready for implementation, we will submit a Change Request to OMB for prior approval.

4. Why We Cannot Use Duplication 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. SSA notes that State Mental Institutions in the Onsite Review Program are exempted from the annual accounting requirement that are required of other Organizational Representative Payees such as those covered under OMB No. 0960-0691 (SSA-6234).

5. Minimizing Burden on Small Respondents

This collection does not significantly 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-9584-BK, we would be unable to determine whether the state institution serving as payee needs guidance, or if we require a change in representative payee. This would be a violation of Sections *205(j)(3)(B)* and

1631(a)(2)(C) of the *Act.* In addition, we would not have vital data needed to conduct the onsite review. Because we only collect the information triennially, 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 September 24, 2026, at 91 FR 60685, and we received no public comments. The 30-day FRN published on November 25, 2026, at 91 FR 76295. 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 development 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 of 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)***	**Total Annual Opportunity Cost (dollars)****
SSA-9584-BK	63	1	60	63	$19.74*	$1,244**

* We based this figure on an average Personal Care and Service Worker's hourly wages ($19.74), as reported by Bureau of Labor Statistics data (Occupational Employment and Wage Statistics).

** This figure does not represent actual costs that SSA is imposing on individuals; rather, these are theoretical opportunity costs for the additional time respondents will spend to complete the information collection. **There is no actual charge to respondents to complete the information collection**.

We did not include any travel costs for this information collection, as P&As are required to complete the form with the state mental institution representatives

during the onsite review (onsite at the mental institution). Therefore, there are no travel costs for the respondents.
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**	**Estimate Learning Cost (minutes)**	**Estimated Total Annual Burden (hours)**	**Total Annual Learning Cost (dollars)****
63	1	60	63	$1,244*****

*****We based this dollar amount on the Average Theoretical Hourly Cost Amount in dollars shown on the burden chart above.

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 **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 **63** burden hours (reflecting SSA management information data), which results in an associated theoretical (not actual) opportunity cost financial burden of **$2,488**. 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 the Federal Government

There is no annual cost to the Federal Government associated with the use of this collection instrument. With the implementation of Section *101* of the *Strengthening Protections for Social Security Beneficiaries Act of 2018*, the use of the SSA-9584-BK is now limited to the P&As. The P&As print the SSA-9584-BK and use it to collect information during State mental institutions onsite reviews. However, there is a cost associated with the annual grants awarded to the P&As in each state to conduct all representative payee reviews. For Grant Year four (GY4), the cost of the State Mental Onsite Review Program was $846,906. We calculated that figure by using the average cost per review of $8,303 for the 102 reviews. Once the SSA-9584-BK is completed, the P&As

upload the form into the system and use the information collected as a reference to complete the subsequent reports of findings.

15. Program Changes or Adjustments to the Information Collection Request

When we cleared the this ICR in 2023, the burden was 68 hours. However, we are currently reporting a burden of **63** hours. The decrease in burden hours stems from a decline in the number of State institutions participating in the onsite review program. As of April 2026, there are approximately 188 State institutions participating in the onsite review program. SSA reviews institutions triennially, reviewing one-third (63) of the 188 participating institutions each year. These figures represent current Management Information data.

*Note: The total burden reflected in ROCIS is **126**, while the burden cited in #12 of the Supporting Statement is **63**. This discrepancy is because the ROCIS burden reflects the learning costs. In contrast, the chart in #12 above 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.