

**SUPPORTING STATEMENT FOR FORM
SSA-8202-BK & SSA-8202-OCR SM
STATEMENT FOR DETERMINING CONTINUING ELIGIBILITY
SUPPLEMENTAL SECURITY INCOME PAYMENT**

20 CFR 416.204

OMB No. 0960-0145

A Justification

1. *Title XVI, part A, section 1611(c)(1) of the Social Security Act* requires that ". . . eligibility for and the amount of [supplemental security income (SSI)] benefits . . . shall be redetermined at such time or times as may be provided by the [Commissioner]."

20 CFR 416.204 of the regulations provides that redeterminations (RZs) will be made periodically on a scheduled basis, or when the Social Security Administration (SSA) is informed of a change which would affect an SSI recipient's continued eligibility or payment amount.

2. SSA employees conduct RZ telephone or face-to-face interviews with SSI recipients and representative payees of SSI recipients and document the information gathered during the interview process through our Modernized SSI Claims System (MSSICS) and its paper equivalent the ¹SSA-8202-BK. The information is used in middle-error-probability (MEP) and low-error-probability (LEP) RZ cases to determine whether SSI recipients have met and continue to meet all statutory and regulatory requirements for SSI eligibility and whether they have been and are still receiving the correct payment amount.

Form SSA-8202-OCR-SM (Optical Character Recognition-Self Mailer) collects information similar to that collected on Form SSA-8202-BK and is a self-help form. It is used exclusively in LEP RZ cases, and is mailed every 6 years to recipients, who complete it without personal contact interviews. This form has been found to be very cost effective. Periodic collection of this information is the only way SSA can make these determinations.

¹ SSA designates its forms based on construction, i.e. a form constructed in book format is BK. SSA reformatted the SSA-8202-F6 to BK format as a result of the latest revisions (approved by OMB in December 2002).

3. Approximately 90% of the SSA-8202-BK interviews are collected through our Modernized SSI Claims System (MSSICS) and the remaining 10% of interview are collected on the paper Form SSA-8202-BK. In addition, SSA conduct's electronic interfaces with records of other government entities to determine whether there are conflicts between the information we have on our system of records and other government entities; however any conflicting information we get through these sources must be verified with the SSI recipient. Under the current agency's Government Paperwork Elimination Act (GPEA) plan, the SSA-8202 is not scheduled for online implementation because of the high risk of payment error and the cost effectiveness to the agency.
4. Information collected by the Form SSA-8202-BK is also collected by the form SSA-8203-BK. Form SSA-8203-BK (OMB Number 0960-0416) is a more comprehensive, complex redetermination form used to conduct HEP redeterminations. It is not a self-help form and is always completed by SSA field office personnel conducting personal contact interviews with MISSICS. Form SSA-8202-BK is a simpler design but is not intended for used in HEP redeterminations. Conducting low and middle-error profile (LEP/MEP) redeterminations using Form SSA-8203-BK instead of Form SSA-8202-BK creates an unnecessary burden on the recipients at a higher cost to the Federal government. Therefore, the two forms are not used for the same purpose.

Form SSA-8202-OCR-SM also collects information similar to that gathered by Form SSA-8202-BK. Unlike the SSA-8202-BK, Form SSA-8202-OCR-SM is a self-help form. It is the simplest of the three forms, containing only 16 questions. By contrast, Form SSA-8202-BK contains 17 questions and Form SSA-8203-BK contains 28. The questions are less detailed than those on the other two redetermination forms. Form SSA-8202-OCR-SM is used exclusively for LEP redeterminations. It is mailed on a 6-year cycle to recipients who complete it without personal contact interviews. It has been found to be very cost effective. Form SSA-8202-OCR-SM serves a different purpose than either the SSA-8202-BK or Form 8203-BK. The three forms are not used for the same collection purposes.

5. This collection does not significantly impact a substantial number of small businesses or other small entities.
6. Potential eligibility or events affecting payment may go undetected if RZs are not conducted. This can adversely affect recipients through underpayments (i.e., erroneously low benefit payments) or overpayments (excessive benefits payments which will result in collection activities). MEP redeterminations are conducted annually and have proven to be cost effective. A majority of LEP cases are conducted on a 6-year cycle. Conducting these types of redeterminations less frequently would compromise program integrity. There are no technical or legal obstacles that prevent burden reduction.

7. There are no special circumstances that would cause an information collection to be conducted in a manner inconsistent with 5 CFR 1320.5.
8. The 60-day advance Federal Register Notice was published on May 9, 2006, at 68 FR 27016, and SSA received no public comments. The second Notice was published on ²July 31, 2006, at 71 FR 43270 and to date SSA has received no public comments.

There have been no outside consultations with members of the public.

9. SSA provides no payment or gift to the respondents.
10. The information collected is protected and held confidential 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. The information collection does not contain any questions of a sensitive nature.
12. The burden estimate for each form is as follows:

	Respondents	Frequency of Response	Average Burden Per Response	Estimated Annual Burden
MSSICS & SSA-8202-BK	300,000	1	21-min	105,000 hours
SSA-8202-OCR-SM	1,000	1	11-min.	183 hours
Total Respondents	301,000		TOTAL BURDEN	105,183 Hours

The total burden is reflected as burden hours. No separate cost burden has been calculated.

13. There is no known cost burden to the respondents.
14. The annual cost to the Federal Government is approximately \$28 million, which includes printing, postage, envelopes, and SSA staff time. However, according to SSA's quality assurance dollar impact data, the benefits achieved in terms of prevented/collected overpayments and paid/prevented underpayments are approximately \$1.8 billion.

² Please Note: Due to several outstanding clearance issues this collection was extended through February 2007. Also please note that the burden estimate cited in both FRN's were significantly higher than the request in this ICR. This is due to budgetary constraints that are outlined in item 15 of the supporting statement.

15. The actual time it takes to complete the SSA-8202-BK and SSA-8202-OCR will increase by 2-minutes per response. This increase is due to the additional questions and format revisions to the collections. Please see the revision addendums for a complete description of these modifications. As a result, the SSA-8202-OCR will move from 9 minutes to 11 minutes and the SSA-8202-BK will increase from 19 to 21 minutes.

However, despite the increase per individual response the overall annual burden will be substantially less because of budgetary constraints on the agency. The FY07 Presidential budget substantially reduced the amount of funds for SSI redeterminations. The SSA-8202-BK and SSA-8202-OCR-SM will have minimal usage in the Field Offices because SSA scheduled 60,000 ³electronic redeterminations, 25,000 High Error Profile cases and expects any other unscheduled redeterminations to be completed by Field Offices in FY07. SSA expects no increases in the redetermination budget for FY08 and expects the above figures in #12 to remain the same.

16. The results of the information collected will not be published.
17. OMB has granted SSA an exemption from the requirement to print the OMB expiration date on its forms. SSA produces millions of public-use forms, many of which have a life cycle longer than that of an OMB clearance. SSA does not periodically (e.g., on an annual basis) revise and reprint its public-use forms. This exemption was granted to avoid making otherwise useable editions of forms obsolete only because the expiration date had been reached. In addition, government waste has been avoided because stocks of forms would not have to be destroyed and reprinted.
18. SSA is not requesting an exception to the certification requirements. Please note, however, that statistical survey methodology is not used for this information collection.

B. Collection of Information Employing Statistical Methods

Statistical methods for the collection of information are not used.

³ Electronic redeterminations (eRZs) are conducted using the SSA-3988 & SSA-3989 OMB control numbers 0960-0634.