

**Supporting Statement for Centenarian Project Development Worksheets:
Face-To-Face Interview; Telephone Interview;
Third Party Contact; Unable To Locate
20 CFR 416.204(b) and 422.135
OMB No. 0960-NEW**

A. Justification

1. Introduction/Authoring Laws and Regulations

The Social Security Administration (SSA) Office of Operations needs to document the results of interviews we conduct with Supplemental Security Income (SSI) recipients and Old-Age, Survivors, and Disability Insurance beneficiaries who are 103 years old or older, and in current pay status. For this Centenarian Project, SSA needs to contact these beneficiaries to determine whether they are still alive, if they need a representative payee, or if they need a change in representative payees. We require this anti-fraud initiative to determine whether we are issuing improper payments and whether we need to establish or remove a representative payee.

Sections 205(a) & (b) and 1631(e)(1) of the *Social Security Act*, corresponding to Sections 42 U.S.C. 405 and 42 U.S.C. 1383 of the *United States Code*, give SSA the authority to collect the information. Since these interviews may lead to changes within the recipient's payments, 20 CFR 416.204(b) and 422.135 of the *Code of Federal Regulations* cover reports from beneficiaries and SSA's policies for redeterminations.

2. Description of Collection

SSA field office personnel obtain the information through one-time, in-person interviews with centenarians. If the centenarians have representatives or caregivers, SSA office personnel will invite them to the interviews. During the interview, SSA employees make overall observations of the centenarian and their representative payee (if applicable). The interviewer uses the appropriate Centenarian Development Worksheet as a guide for the interview, in addition to documenting findings during the interview. Non-completion of the Worksheets, or refusal of the interview, will not result in the suspension of the centenarian's payments. SSA conducts the interview one time only at the beneficiary's residence or over the phone if a site visit is not possible. This collection is a regional violation we recently discovered. Upon OMB approval, we intend to expand nationwide (see Addendum for further details). Respondents are SSI recipients or Social Security beneficiaries 103 years old or older, their representative payees, or their caregivers.

3. Use of Information Technology to Collect the Information

SSA employees will document the outcome of the interviews on the paper Development Worksheets as automated technology, while preferable, is

not currently available due to budget constraints. Since we will not be able to furnish interviewers with appropriate equipment to access an electronic form remotely, SSA will not create an electronic version of the form at this time. We must conduct in-person interviews at the centenarian's residence to obtain overall observations by the interviewer, or via telephone in cases when a site visit is not possible. Therefore, SSA employees will not ask a centenarian to come to the office to conduct in-office interviews. SSA employees will print the appropriate Development Worksheet from the Centenarian Project website to use during the interview.

4. **Why We Cannot Use Duplicate Information**

The nature of the information we are collecting and the manner in which we collect it preclude duplication. SSA does not use another collection instrument to obtain similar data.

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**

The consequences of not conducting these interviews are two-fold: 1) SSA would have no means to confirm if the centenarian is in need of a representative payee or a change in payee; and 2) SSA would not know if the individual is actually deceased, and someone else is committing fraud by cashing the monthly payment we send. Because we collect the information only once per centenarian we cannot collect it less frequently. There are no technical or legal obstacles to prevent 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 first Federal Register notice published on January 28, 2010 at 75 FR 4606. We received one comment from the public as a result of this notice:

SSA received a public comment on February 10, 2010 requesting clarification of the purpose and scope of the collection. Specifically, the submitter asked whom SSA interviews if the beneficiary is deceased, and how SSA will assess the well-being of the beneficiaries. Further, the submitter also wished to know what standards SSA will use to assess a centenarian's well-being, and what actions SSA will take if there appear to be problems.

In response, SSA will address both questions raised in this comment:

The first question concerns how the beneficiary's death affects the interview process. If SSA attempts to schedule an interview with a beneficiary who SSA later learns is deceased, we will not conduct an interview. Upon report of the beneficiary's death, SSA will suspend benefits pending receipt of proof of death. Once SSA receives proof of death, we will terminate the beneficiary's benefits effective from the date of death.

The second question asked what standards SSA will use to determine the beneficiary's well-being. If during the interview the SSA representative suspects that a claimant may not be capable of handling their own benefits, the SSA representative will follow current policy procedures for developing evidence of capability. We do not intend to use this interview as a means to determine capability; however, if capability of the beneficiary appears to be a concern, we expect the SSA representative to assess the beneficiary when possible. Because the capability of the beneficiary will not prevent proper verification of the beneficiary's identity, SSA will continue the interview regardless of the beneficiary's state of capability. If needed, the interviewer will develop capability issues after completing the interview.

The second Federal Register notice published on March 30, 2010 at 75 FR 15761. If we receive any comments in response to the 30-day Notice, we will forward them to OMB. There have been no outside consultations with members of the public.

9. **Payment or Gifts to Respondents**
SSA does not provide payment or gifts to the respondents.
10. **Assurances of Confidentiality**
SSA protects and holds confidential 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**
In April 2010, SSA will select centenarians 103 years old or older in current pay status. SSA estimates we will interview approximately 14,000 centenarian cases nationally. We estimate 15 minutes as the average burden per Centenarian Development Worksheet for 3,500 total burden hours. SSA will conduct only one interview per centenarian, using the most appropriate Worksheet based on whom we interview, and how we conduct the interview. The total burden for this ICR is 3,500 hours. This figure represents burden hours, and SSA did not calculate a separate cost

burden.

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 \$185,573. This estimate is a projection of the costs for printing the Centenarian Development Worksheets, visiting the centenarian, and filling out the appropriate Worksheet.
15. **Program Changes or Adjustments to the Information Collection Request**
This collection, currently in use without OMB approval, increases the public reporting burden. See #12 above for the burden figures.
16. **Plans for Publication Information Collection Results**
SSA will not publish the results of the information collection.
17. **Displaying the OMB Approval Expiration Date**
SSA is not requesting an exception to the requirement to display an expiration date.
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.