

**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* (the *Act*) require the Commissioner of the Social Security Administration (SSA) to establish a system of accountability monitoring for institutions in United States. 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 uses Form SSA-9584-BK: (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 a representative payees; and (3) as the basis for conducting onsite reviews of the Institutions and preparing subsequent reports of findings. 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 did not create an electronic version of form SSA-9584-BK under the agency's Government Paperwork Elimination Act (GPEA) plan because only 78 respondents complete the form each year. This is less than the GPEA cut-off of 50,000.
4. **Why We Cannot Use Duplication Information**
The nature of the information we are collecting and the manner in which we are collecting 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**
 If we did not use Form SSA-9584-BK, we would be unable to determine whether the institutional payee needs guidance, or if a change in representative payee is required. In addition, we would not have vital data needed to conduct the onsite review. Because we only collect the information on an as needed basis, 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 December 17, 2013, at 78 FR 76378, and we received no public comments. The 30-day FRN published on March 10, 2014 at 79 FR 13368. 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 maintenance of this form.

9. **Payment or Gifts to Respondents**
 SSA provides no 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) |
|------------------------|-----------------------|-----------------------|---------------------------------------|---------------------------------------|
| SSA-9584-BK | 78 | 1 | 60 | 78 |

The total burden for this ICR is 78 hours. This figure represents burden hours and we 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 the Federal Government**

The annual cost to the Federal Government is approximately \$1,329. This estimate is a projection of the costs for printing and distributing the collection instrument and for collecting the information.

15. **Program Changes or Adjustments to the Information Collection Request**
There has been a decrease in burden hours. This change stems from the number of State institutions participating in the onsite review program continues to decline. At this time, there are approximately 234 State institutions participating in the onsite review program. SSA reviews facilities triennially, reviewing one-third (78) of the 234 participating institutions each year.
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.