

Supporting Statement for Form SSA-6233
Representative Payee Report of Benefits and Dedicated Account
20 CFR 416.546, 416.635, 416.640, 416.665
OMB No. 0960-0576

A. Justification

1. Introduction/Authoring Laws and Regulations

Section 1631(a) of the *Social Security Act (Act)*, and Sections 20 CFR 416.546, 416.640, 416.635 and 416.665 of the *Code of Federal Regulations*, require representative payees to establish and maintain a separate (i.e., “dedicated”) account in a financial institute when a blind or disabled child under age 18 is eligible for certain past-due Supplemental Security Income (SSI) monthly payments, on or after August 23, 1996. Per the regulations, the payee has the option to deposit certain subsequent past-due benefits and underpayments into the dedicated account. SSA restricts the funds from the account to specific purchases. SSA requires representative payees (RP) with dedicated accounts to report the activity of funds in the account annually, to ensure deposits and expenditures comply with the law. This reporting requirement remains in effect either until the RP depletes the account, or until SSA terminates eligibility for SSI payments.

2. Description of Collection

SSA requires RPs to submit a written report accounting for the use of money paid to Social Security or Supplemental Security Income (SSI) recipients, and to establish and maintain a dedicated account for these payments. SSA uses Form SSA-6233 to: (1) Ensure the RPs use the payments for the recipient’s current maintenance and personal needs; and (2) confirm the expenditures of funds from the dedicated account remain in compliance with the law. Respondents are RPs for SSI and Social Security recipients.

3. Use of Information Technology to Collect the Information

SSA did not create an electronic version of Form SSA-6233 under the agency’s Government Paperwork Elimination Act (GPEA) plan because only 30,000 respondents complete the form annually. This is less than the GPEA cut-off of 50,000.

4. Why We Cannot Use Duplicate Information

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

5. Minimizing Burden on Small Respondents

This collection does affect small businesses or other small entities. However, if we did not impose the burden we would be unable to obtain annual representative payee reporting from those small businesses or entities, which serve as payees for Social Security recipients. Since this collection of information can affect small

businesses serving as representative payees, we minimized the burden by incorporating YES and NO responses where feasible.

6. Consequence of Not Collecting Information or Collecting it Less Frequently

If we did not use Form SSA-6233, we would have no way of knowing if the payee knowingly made any unauthorized expenditures, constituting a “misapplication” of funds, and we would not know if they are recoverable from the payee on a dollar-for-dollar basis. Because we collect this information annually to avoid fraud and unauthorized expenditures, we cannot collect it less frequently. There are no technical or legal obstacles that 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 60-day advance Federal Register Notice published on July 10, 2018, at 83 FR 31987, and we received no public comments. The 30-day FRN published on October 3, 2018 at 83 FR 49965. If we receive any comments in response to this Notice, we will forward them to OMB.

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 for 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-6233	36,228	1	20	12,076

The total burden for this ICR is **12,076** hours. We based these figures on current management information data. 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 on the respondents.

14. Annual Cost To Federal Government

The annual cost to the Federal Government is approximately \$231,000. This estimate accounts for costs from the following areas: (1) designing, printing, and distributing the form; and (2) SSA employee (e.g., field office, 800 number) information collection and processing time.

15. Program Changes or Adjustments to the Information Collection Request

When we last cleared this IC in 2015, the burden was 10,000 hours. However, we are currently reporting a burden of 12,075 hours. This change stems from an increase in the number of respondents from 30,000 to 36,228. There is no change to the burden time per response. Although the number of responses changed, SSA did not take any actions to cause this change.

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.