



SOCIAL SECURITY

The Commissioner

October 11, 2019

The Honorable Richard Neal
Chairman, Committee on Ways and Means
U.S. House of Representatives
Washington, DC 20515

Dear Mr. Chairman:

Enclosed is our Reassessment of Payee Selection and Replacement Policies Report as required by section 204 of Public Law 115-165, *the Strengthening Protections for Social Security Beneficiaries Act of 2018*. The report details the results of our review and reassessment of the appropriateness of our order of preference for selecting representative payees and the effectiveness of our policy and operational procedures for determining representative payee changes.

If you have any questions, please contact me or have your staff contact Eric Skidmore, our Acting Deputy Commissioner for Legislation and Congressional Affairs, at (202)358-6030.

I am also sending this report to Ranking Member Brady and to the Chairman and Ranking Member of the Senate Committee on Finance.

Sincerely,

Andrew Saul
Commissioner

Enclosure



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October 11, 2019

The Honorable Kevin Brady
Ranking Member, Committee on Ways and Means
U.S. House of Representatives
Washington, DC 20515

Dear Ranking Member Brady:

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Sincerely,

Andrew Saul
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October 11, 2019

The Honorable Chuck Grassley
Chairman, Committee on Finance
U.S. Senate
Washington, DC 20510

Dear Mr. Chairman:

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I am also sending this report to Ranking Member Wyden and to the Chairman and Ranking Member of the House Committee on Ways and Means.

Sincerely,

Andrew Saul
Commissioner

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SOCIAL SECURITY

The Commissioner

October 11, 2019

The Honorable Ron Wyden
Ranking Member, Committee on Finance
U.S. Senate
Washington, DC 20510

Dear Senator Wyden:

Enclosed is our Reassessment of Payee Selection and Replacement Policies Report as required by section 204 of Public Law 115-165, *the Strengthening Protections for Social Security Beneficiaries Act of 2018*. The report details the results of our review and reassessment of the appropriateness of our order of preference for selecting representative payees and the effectiveness of our policy and operational procedures for determining representative payee changes.

If you have any questions, please contact me or have your staff contact Eric Skidmore, our Acting Deputy Commissioner for Legislation and Congressional Affairs, at (202)358-6030.

I am also sending this report to Chairman Grassley and to the Chairman and Ranking Member of the House Committee on Ways and Means.

Sincerely,

Andrew Saul
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**Strengthening Protections for Social Security Beneficiaries Act of
2018, Pub. L. 115-165**

Section 204: Reassessment of Payee Selection and Replacement Policies Report to
Congress



OCTOBER 11, 2019

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Executive Summary

On April 13, 2018, the President signed the *Strengthening Protections for Social Security Beneficiaries Act of 2018*, Pub. L. 115-165 (SPSSBA). This law made a number of changes to the Social Security Act to improve and strengthen the representative payee (payee) Program for Old Age, Survivors, and Disability Insurance (OASDI); Supplemental Security Income (SSI); and Special Benefits for Certain World War II Veterans (SVB) beneficiaries. Section 204 of the SPSSBA requires us to provide a report on the results of our review and reassessment of our payee selection policies no later than 18 months after the date of enactment.

We design our policies to ensure our primary goal: selecting the most suitable payee for each beneficiary. As required by the SPSSBA, we engaged the public as we conducted our review and reassessment of our payee selection and replacement policies. Specifically, we:

1. Collaborated with the Social Security Advisory Board (SSAB) to host a forum “*Moving Forward-Implementing Changes in the Representative Payee Program.*”
2. Published a Federal Register Notice, entitled “*Review and Reassessment of the Social Security Administration's (SSA) Representative Payee Selection and Replacement Policies.*”

Overall, the public supports our current order of payee preference. Based on our review and reassessment:

1. We implemented policy and payee system enhancements to support our employees with making payee selection and suitability determinations. For example, we streamlined the payee preference list and creditor payee policies and integrated a criminal background check into our payee system.
2. We continue to explore ways to enhance our payee selection process, suitability determinations, and ongoing oversight of payees. Many of the enhancements we continue to explore would require changes to the Social Security Act, regulations, policy, and our systems.

Background

Representative Payee Overview

OASDI, SSI, and SVB benefits provide an important lifeline for millions of elderly and disabled Americans, survivors of deceased workers, and young children. In 1939, Congress recognized that not all beneficiaries could manage their benefits;¹ and authorized the Social Security Administration² to appoint a payee to receive and manage benefits on behalf of those beneficiaries.³ A payee uses the beneficiary's benefit to meet the beneficiary's current or foreseeable needs such as food, clothing, shelter, medical care, and personal comfort items. After meeting these needs, the payee must conserve or invest any remaining funds for the beneficiary's future use.

We have approximately 6 million payees managing \$70 billion in annual benefits for 8.3 million beneficiaries. Fifty-two percent of the beneficiaries with payees are minor children. Family members, primarily parents or spouses, serve 84.9 percent of the beneficiaries who have payees. Of the 6 million payees, 33,197 (less than one percent) are organizational payees serving approximately 952,000 beneficiaries. Among the 33,197 organizational payees, 1,315 are fee-for-service (FFS) payees, which are organizational payees that we authorize to collect a fee as payment for providing payee services. FFS payees serve approximately 212,500 beneficiaries.⁴ Among our current payees, 21,555⁵ are a creditor⁶ of the beneficiaries they serve 5,271 individual creditor payees and 15,189 organizational creditor payees⁷.

Strengthening Protections for Social Security Beneficiaries Act of 2018: Section 204-Reassessment of Payee Selection and Replacement Policies

Section 204 of the SPSSBA requires us to conduct a review and reassessment, with opportunity for public comment, of the:

1. Appropriateness of the order of preference for selecting payees, including payees who may be creditors of the beneficiary or who are private, for-profit institutions, and

¹ The term "benefits" in this report refers to both Title II and Title VIII benefits and Title XVI payments.

² Social Security Act Amendments of 1939 (ch. 666, § 205(j), 53 Stat. 1360, 1371).

³ We use the terms "beneficiary" or "beneficiaries" in this report to generally refer to both OASDI and SVB beneficiaries, as well as SSI recipients.

⁴ Figures taken from the Social Security Annual Report on the Results of Periodic Representative Payee Site Reviews and Other Reviews, FY 2018.

⁵ Data provided by the Social Security Office of Systems on October 18, 2018.

⁶ POMS GN 00502.135

⁷ See footnote 5.

2. Effectiveness of our policy and operational procedures for properly determining when to change a payee. This includes from a payee that has a higher order of preference to a payee that has a lower order of preference. Additionally, when a request to change a payee arises from someone other than the beneficiary.

Furthermore, Section 204 requires us to provide a report on the results of our review and reassessment of our payee selection policies no later than 18 months after the date of enactment.

Representative Payee Process

Capability Development and Determination

We presume a legally competent adult beneficiary is capable of managing, or directing someone else to manage, his or her benefits.⁸ If we suspect or receive information that an adult beneficiary has a mental or physical condition preventing him or her from managing or directing someone else to manage benefits, we make a capability determination.

To assist us in developing and making the capability determination, we evaluate legal evidence, medical evidence, and lay evidence for the adult beneficiary.⁹ If a court order establishes that the beneficiary is legally incompetent, the beneficiary must receive benefits through a payee and no other capability development is necessary. The court order must specifically address the beneficiary's competency or must contain a statement regarding the individual's ability to handle his or her financial affairs.¹⁰

After reviewing all evidence, if we determine a beneficiary is unable to manage or direct the management of his or her benefits, we develop for and select a payee. We generally presume a child under age 18 is not capable of managing or directing someone else to manage his or her benefits.¹¹

Selecting a Payee

When we determine a beneficiary is not capable of managing or directing someone else to manage his or her benefits and needs a payee, we choose an individual or organization that shows concern for and will best serve the interest of the beneficiary. With the exception of adult disabled beneficiaries with a substance abuse condition, we look first to family members and

⁸ 20 C.F.R. §§ 404.2001, 416.601, and POMS GN 00502.001 define capability as a beneficiary's ability to manage or direct the management of his or her Social Security benefits.

⁹ 20 C.F.R. §§ 404.2015, 416.615, and POMS GN 00502.020 defines our capability evaluation criteria.

¹⁰ POMS GN 00502.300 is a digest of State guardianship laws providing the conditions under which a court order constitutes a finding of legal incompetence for each State and territory.

¹¹ 20 C.F.R. §§ 404.2010(b), 416.610(b), and POMS GN 00502.070 provide exceptions for directly paying legally emancipated children or children between ages 15-17.

close friends as potential payees.¹² To assist with identifying prospective payees, we developed categories of preferred payees based on the type of beneficiary needing a payee, i.e. minor child beneficiary, adult beneficiary, and adult beneficiary with a substance abuse condition.¹³ Although these categories are flexible, the ordering indicates our preference for selecting payees. Our primary goal is to select a payee that will best serve a beneficiary's interest; therefore, we evaluate all payee applicants' suitability to act as payee before we appoint an applicant. When we evaluate a payee applicant's suitability, we consider all factors including the applicant's:

- Relationship to the beneficiary;
- Concern for the beneficiary's well-being;
- History of serving as payee, including any misuse of benefits;
- Employment or other sources of income;
- Custody of the beneficiary;
- Criminal history; and
- Financial or creditor relationship with the beneficiary.

During our evaluation of a payee application, if information provided by an applicant causes concern or raises questions, we obtain additional information from third parties to verify the applicant's statements. For example, we may contact the beneficiary's custodian to confirm custody. We resolve any discrepancy or inconsistency before we appoint the applicant as a payee.

The Social Security Act and our regulations¹⁴ prohibit certain individuals or organizations from serving as a payee, with some exceptions. For example, an applicant with a financial or creditor relationship cannot serve as payee unless we determine the applicant is the most suitable and is a(n):

- Relative of the beneficiary living in the same household;
- Legal guardian or legal representative of the beneficiary;
- Facility that is licensed or certified as a care facility under the laws of the state or a political subdivision of a state;

¹² Section 205(j)(2)(C)(v) and 1631(a)(2)(B)(vii) of the Social Security Act defines the payee preference list for DAA beneficiaries.

¹³ The regulations at 20 C.F.R. §§ 404.2021 and 416.621, POMS GN 00502.105 defines the categories of preferred payees. See Appendix A for our POMS preferred payee charts.

¹⁴ Sections 205(j)(C)(i), 807(d)(1) and 1631 (a)(2)(B)(iii) of the Social Security Act and the regulations at §§ 404.2022, 408.622, and 416.622.

- Administrator, owner, or employee of a facility that is licensed or certified as a care facility under the laws of the state or a political subdivision of a state, and the beneficiary lives in the facility and there is no alternative payee; or
- Individual or organization that poses no harm to the beneficiary and the creditor relationship poses no substantial conflict of interest and there is no alternative payee.

Successor Payees

When we become aware of circumstances that suggest a payee is no longer suitable or is no longer able to serve, we stop sending benefits to the payee.¹⁵ Some of these circumstances are when a payee dies, becomes incarcerated, misuses benefits, fails to cooperate with our agency, or no longer wishes to serve as a payee.

For legally competent beneficiaries, we pay benefits directly to the beneficiary while we develop for a successor payee, unless we determine doing so would cause substantial harm. For legally incompetent beneficiaries and children under age 15,¹⁶ we suspend benefits while developing for a successor payee.

There are instances when an individual or organization will apply to be the payee for a beneficiary who already has a payee. We will also receive requests from beneficiaries who wish to serve as their own payee and receive direct payments. While we develop the new payee application or the beneficiary's capability, we will continue paying the current payee if there are no concerns about the payee's suitability. As part of our development, we contact the current payee to discuss the possibility of a payee change, unless such contact would be inappropriate, such as if the beneficiary is alleging misuse of benefits by the current payee. A conversation with the beneficiary's current payee provides us the opportunity to confirm information we receive from the payee applicant, such as custody of the beneficiary, and advise the current payee that we may make a payee change.

Review and Reassessment of Payee Selection and Replacement Policies

Public Engagement

To engage the public in our review and reassessment of the order of our payee preference and selection policies, we:

1. Collaborated with the SSAB to host a forum to discuss our payee program.

¹⁵ 20 C.F.R. §§ 404.2050, 416.650, and POMS GN 00504.100.

¹⁶ See footnote 11, page 4.

On September 7, 2018, the SSAB hosted a public forum entitled “*Moving Forward-Implementing Changes in the Representative Payee Program.*” The purpose of the forum was to discuss ideas on how to strengthen the payee program, and evaluate payee suitability and selection through evidence-based policymaking. Forum participants included a wide array of policymakers, practitioners, advocates, and researchers, and presenters offered numerous suggestions for improvement of the payee selection process including:

- Enhancing our payee system so that we can easily identify creditors.
- Ensuring consistent application of our payee policies, including our policy on:
 - Contacting the current payee when we are considering a payee change and
 - Selecting an organization to serve as payee.
- Preventing certain types of creditors from serving as payee or only allowing these payees to serve in a limited capacity when there is no alternative payee available.
- Conducting regular reviews of creditor payees.

2. Published a Federal Register Notice (FRN), which requested feedback related to payee selection and suitability.

On December 14, 2018, we published an FRN entitled “*Review and Reassessment of the Social Security Administration's (SSA) Representative Payee Selection and Replacement Policies*”¹⁷ to solicit public feedback related to the appropriateness of our order of preference lists for selecting payees and the effectiveness of our policy and operational procedures in determining when to change a payee. The FRN presented nine specific questions and we received 24 comments. Overall, the feedback supported our current order of payee preference. Some commenters suggested changes to the payee preference list for adults without a substance abuse condition, primarily suggesting that we reorganize the list to move non-profit organizations higher on the list and move institutions where beneficiaries live (e.g. State-run facilities) lower on the list. Additionally, numerous commenters suggested:

- Creditors (e.g. landlord, nursing home) should not serve as payees or should serve only in a limited capacity when there is no alternative payee available;
- Mandatory site reviews of creditor payees;
- Training for our employees to ensure consistent application of our policies; and

¹⁷ Federal Register Notice [SSA-2018-0048](#), 83 Fed.Reg. 64422 (Dec. 14, 2018). See Appendix B for a list of the questions.

- Enhancements to our payee system to assist our employees with payee suitability determinations and improve our ability to collect data regarding payees.

Implemented Policy and System Enhancements

We determined that while our overall payee preference and replacement policies are appropriate, there are ways we can improve our policies and payee system to support our employees with making payee selection and suitability determinations. We have implemented the following improvements:

1. Streamlined and enhanced our Program Operations Manual System (POMS)¹⁸ instructions on creditor payee applicants to include:
 - Detailed examples of creditor payees;
 - Streamlined exceptions for selecting creditor payee applicants by providing technicians detailed guidance on conditionally appointing creditor payees;
 - Enhanced instructions for conditionally selecting a creditor payee by outlining additional steps required to evaluate a payee’s performance and ensure the payee meets the needs of the beneficiary; and
 - Added reminders for our employees to follow POMS to evaluate payee applicants and select qualified payees.
2. Streamlined and enhanced our POMS¹⁹ instructions on the payee preference list to include:
 - Added a list of the POMS instructions for our employees to follow to evaluate payee applicants and to determine the most suitable payee.
 - Organized numbering of the payee preference list to reflect the numbers found in our regulations and organized the lists into charts to make them more user friendly.
3. Updated our POMS instructions on developing and certifying the community-based requirement for nonprofit FFS payee.

A nonprofit organization that is serving as a payee must meet certain criteria before we approve the organization to collect a fee for providing payee services. Based on comments from the SSAB forum and lessons learned from monitoring reviews, we updated our POMS instructions to provide additional guidance on the statutory

¹⁸ POMS section updated GN 00502.135

¹⁹ POMS section updated GN 00502.105.

requirement that nonprofit organizations be community-based in order to collect a fee for payee services. This change helps ensure we select the most suitable payee for each beneficiary. Additionally, we added new annual certification procedures to ensure that FFS payees are community-based.

We consider a nonprofit organization to be community-based if it meets all of the following criteria:²⁰

- a. The organization's physical business office and its beneficiaries' residence addresses are located within the same Social Security field office (FO) service area. If the organization serves beneficiaries outside its FO service area, the organization's physical business office must be within 75 miles of its beneficiaries' servicing FO(s);
- b. The physical business office is accessible to the public;
- c. The organization employs at least one staff person who works in the physical business office and handles payee responsibilities. The staff must be available during normal daytime business hours to provide in-person and telephone contact with beneficiaries they serve; and
- d. The organization continues to maintain the physical business office while it collects fees for providing payee services.

FFS Policy Change Considered

Some SSAB forum participants recommended that we give preference to an FFS payee over a creditor payee on our payee preference list for adult beneficiaries without a substance abuse condition. However, in 2016 we completed an internal review of FFS payees that found that misuse of benefits was eight times more prevalent among FFS organizational payees compared to non-FFS organizational payees. In addition, in recent years, we removed several FFS payees due to their misuse of benefits.²¹ Due to these issues and concerns, we are not considering a change to the preference list as it relates to our preference of an FFS payee and view an FFS payee as a payee of last resort. We continue to explore ways to strengthen our policies and procedures related to FFS payees.

Additional Improvements

In addition to the improvements resulting from our review and reassessment, we implemented or are implementing the following improvements to our representative payee selection process:

²⁰ POMS GN 00506.100 provides the community based criteria and provides an exception for remote areas.

²¹ See Ayudando Guardians FFS payee news article, [Albuquerque Journal](#) December 7, 2017.

1. Section 101 of the SPSSBA: Stronger Monitoring of Representative Payees

To assist with our oversight of payees, we are working to enhance our ability to collect better management information and data on payee deficiencies identified during a review, such as allegations of misuse, payee suitability, and third-party referrals to law enforcement or other agencies.

2. Section 201 of the SPSSBA: Advance Designation of Representative Payees.

This section establishes that beneficiaries entitled to or applying for a benefit under title II, title VIII, or title XVI, and who have attained 18 years of age or are emancipated minors, are permitted to advance designate one or more other individuals who could serve as a payee. We are drafting regulations and once implemented, if we determine a beneficiary is not capable of managing or directing the management of his or her benefits, we will use the beneficiary's advance designee as our first step in developing for a suitable payee. We would only consider other potential representative payees, based on our established order of payee preference, when a beneficiary's advance designee is unwilling or unable to serve as payee, or if good cause exists to select another payee.

3. Section 202 of the SPSSBA: Prohibition on Individuals Convicted of Certain Crimes Serving as Representative Payees

In support of our partial implementation, we updated POMS²² instructions and our payee system to include the integration of a criminal background check, including the date of the last check, into the electronic payee application process for non-exempt payee applicants. Additionally, we will continue to enhance the payee system over the next few years to ensure proper documentation and collection of evidence.

Potential Payee Selection, Suitability, and Oversight Enhancements

We continue to evaluate several ideas and suggestions for longer-term improvements that arose during our review and reassessment. Some of these ideas may require updates to our systems and policies and changes to our regulations or the law. The ideas include, but are not limited to:

1. Enhancing our payee system for payee selection and suitability:
 - a. Create a system identifier for known creditor payees. This identifier would provide our employees with a notification at the beginning of a payee application informing them that the applicant is currently a creditor payee for other beneficiaries. Additionally, the identifier would assist us with providing data on creditor payees.

²² POMS sections updated GN 00502.113, GN 00502.117, GN 00502.132, GN 00502.133, GN 00502.185, and GN 00502.301.

- b. Create a payee selection alert and require manager approval when an employee selects a creditor to be a payee. This alert would enforce our current policy regarding the selection of a creditor to serve as payee. Additionally, this alert would assist us with providing data on creditor payees.
 - c. Create a payee selection alert and require manager approval when an employee selects an organization or creditor to serve as payee when the current payee is a family member. This alert would enforce current policy, which is to contact the current payee when making payee changes. Additionally, this alert would enforce our other policies related to payee selection, e.g. our creditor payee policy. Lastly, this alert would provide additional data related to payee changes from family members to organizations or creditors.
 - d. Enforce payee selection policy by making the selection determination screen in the payee system mandatory. Although our current policy is to document all payee selections and suitability determinations, the functionality is not mandatory in the payee system. Systems enforcement of mandatory documentation that includes different categories related to selection and payee suitability would help ensure our employees follow our policies for selecting the most suitable payee for beneficiaries. Additionally, providing employees this mandatory documentation screen would assist us with providing data on payee selections and suitability determinations.
2. Increasing our oversight and monitoring of creditor payees to determine whether we should:
- a. Change the preference list for adult beneficiaries without a substance abuse condition by lowering our preference for an institution or facility where a beneficiary lives.
 - b. Limit certain types of creditors from serving as payee or only serving in certain circumstances when there is no alternative.

Conclusion

We appreciate the opportunity to provide Congress this report on our review and reassessment of our order of payee preference lists and the effectiveness of our policies and procedures for selecting payees. Since the enactment of the SPSSBA, we have reviewed and reassessed our selection and replacement policies and procedures and made enhancements to strengthen the payee suitability and selection process. We continue to evaluate longer-term suggestions that would require additional time, resources, regulatory changes, and potentially changes in the law to implement. We look forward to our continued collaboration in achieving our shared goal of making the payee program as effective and efficient as possible.

APPENDIX A – Preferred Representative Payee Order of Selection Charts

Preferred Payee for Minor Children

Preferred Order of Selection	Preferred Payee
First	<ul style="list-style-type: none"> • Natural or adoptive parent who has custody of the beneficiary. • Legal Guardian
Second	Natural or adoptive parent who does not have custody of the beneficiary, but is contributing toward the beneficiary's support and is demonstrating strong concern for the beneficiary's well-being.
Third	Natural or adoptive parent who does not have custody of the beneficiary and is not contributing toward the beneficiary's support but is demonstrating strong concern for the beneficiary's well-being.
Fourth	<ul style="list-style-type: none"> • Relative who has custody of the beneficiary. • Stepparent who has custody of the beneficiary.
Fifth	Relative who does not have custody of the beneficiary but is contributing toward the beneficiary's support and is demonstrating strong concern for the beneficiary's well-being.
Sixth	<ul style="list-style-type: none"> • Relative who does not have custody of the beneficiary but is demonstrating strong concern for the beneficiary's well-being. • Close friend who does not have custody of the beneficiary but is demonstrating strong concern for the beneficiary's well-being.
Seventh	<ul style="list-style-type: none"> • Social service agency. • Custodial institution.
Eighth	Any person or organization not listed in this chart who shows concern for the beneficiary, is suitable, able, and willing to act as payee.

Preferred Payee for Adults (Without a Substance Abuse Condition)

Preferred Order of Selection	Preferred Payee
First	<ul style="list-style-type: none"> • Spouse or other relative (e.g. parent, adult child) who has custody of the beneficiary or demonstrates strong concern for the beneficiary's well-being. • Legal Guardian or conservator who has custody of the beneficiary or demonstrates strong concern for the beneficiary's well-being.
Second	Friend who has custody of the beneficiary or demonstrates strong concern for the beneficiary's well-being.
Third	<ul style="list-style-type: none"> • Public institution (e.g. state institution) having custody of the beneficiary. • Nonprofit agency having custody of the beneficiary.
Fourth	Private facility operated for profit and licensed under State law, which has custody of the beneficiary (e.g. private nursing homes, private assisted living facilities).
Fifth	<ul style="list-style-type: none"> • Statutory guardian. • Voluntary conservator. • Any person or organization, other than number 6 in this chart, who shows strong concern for the beneficiary, is suitable, able, and willing to act as payee.
Sixth	Organization that charges a fee for providing payee services.

Preferred Payee for Adults with a Substance Abuse Condition

Preferred Order of Selection	Preferred Payee
First	Community-based nonprofit social service agency licensed (if required) by the state or bonded.
Second	Federal, state or local government agency whose mission is to carry out income maintenance, social service, or health care-related activities.
Third	State or local government agency with fiduciary responsibilities.
Fourth	Designee of a state or local government agency referred to in number 2 and 3 in this chart.
Fifth	Family member (e.g. parent, sibling, grandparent, adult child).
Sixth	Legal guardian who has custody or shows strong concern for the beneficiary's well-being.
Seventh	Friend who has custody or shows strong concern for the beneficiary's well-being.
Eighth	Nonprofit agency or institution who has custody.
Ninth	Private facility operated for profit and licensed under State law, which has custody of the beneficiary.
Tenth	Any person or organization not listed in this chart who shows concern for the beneficiary, is suitable, able, and willing to act as payee.

APPENDIX B – Federal Register Notice Questions

- Is the current order of preference list appropriate when selecting or changing a representative payee?
- If you believe that the order of preference list is not appropriate, what would you change about the order of preference list?
- Should we change how we consider public and non-profit agencies or institutions and private, for-profit institutions in our order of preference list?
- Since there are statutory provisions that generally prevent a creditor from serving as a representative payee, should we consider creditor status in our order of preference list? If so, how should we consider creditor status in light of the statute?
- Are our policy and operational procedures effective in properly determining whether to change a representative payee?
- Do we effectively determine when to change from a payee that has a higher order of preference (such as a family member) to a payee that has a lower order of preference (such as a creditor)?
- When a request to change a payee arises from someone other than the beneficiary, do we effectively determine the need to change the payee?
- What would you change about our policies and procedures to help us determine when to change a payee?
- Is there any evidence of difficulty in finding suitable payees, over time and in various circumstances? If so, how should this evidence influence our order of preference list and our policies for changing payees?