

SUPPORTING STATEMENT FOR FORM SSA-2512
PRE-1957 MILITARY SERVICE
FEDERAL BENEFIT QUESTIONNAIRE
20 CFR 404.1301-404.1371
OMB No. 0960-0120

A. Justification

1. The authority to collect the information requested on Form SSA-2512 is contained in *Sections 217(a) through (e) of the Social Security Act* and in *20 CFR 404.1301-404.1371 of the Code of Federal Regulations*. The Social Security Administration (SSA) may grant gratuitous military wage credits for active military service (under certain conditions) during the period September 12, 1940 through December 31, 1956, provided that no other Federal agency (except the Veterans Administration) has credited the service for benefit eligibility or computation purposes.
2. SSA collects specific information about other Federal, military or civilian benefits when the applicant indicates both pre-1957 military service and the receipt of a Federal benefit. This data is used in the claims adjudication process to grant gratuitous military wage credits, when applicable. Form SSA-2512 is used to solicit sufficient information to make a determination of eligibility. The respondents are applicants for Social Security benefits on a record where the wage earner has pre-1957 military service.
3. Improved information technology that would reduce the burden is not available. Because of the low volume of usage of the SSA-2512, SSA determined that this form not be a candidate for compliance with the requirements that SSA collect data through the Internet. Presently there are still no plans to build an Internet based collection of data for this application due to the decreasing number of respondents (see #15 below).
4. The nature of the information being collected and the manner in which it is collected preclude duplication. There is no other collection instrument used by SSA that collects data similar to that collected here.
5. The collection does not have a significant impact on a substantial number of small businesses or other small entities.
6. If this information were not collected, then SSA would not be able to determine if the receipt of other Federal benefits permits or bars the granting of gratuitous wage credits in accordance with applicable laws and regulations. Also, since the collection of this information takes place only when necessary, it cannot be collected less frequently. There are no technical or legal obstacles that prevent burden reduction.
7. There are no special circumstances that would cause this information collection to be conducted in a manner that is not consistent with 5 CFR 1320.5.

8. The 60-day advance Federal Register Notice was published on September 18, 2006 at 71 FR 54705, and SSA has received no public comments. The second Notice was published on January 17, 2007, at 72 FR 2081. There have been no outside consultations with members of the public.
9. SSA provides no payment or gifts to the respondents.
10. The information requested 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. Form SSA-2512 will be used by approximately 5,000 respondents annually. The estimated average response time is 10 minutes, for a total of 833 burden hours. The total burden is reflected as burden hours, and 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 \$7,700. This estimate is a projection of the cost for printing and distributing the collection instrument and for collecting the information.
15. The public reporting burden continues to decrease because there are fewer claimants with military service prior to 1957. We expect the reporting burden to continue to decrease incrementally as the targeted population comes off the Social Security rolls.
16. The results of the information collection will not be published.
17. OMB has granted SSA an exemption from the requirement that the expiration date for OMB approval be printed on its program forms. SSA produces millions of public-use forms, many of which have a life cycle longer than that of an OMB approval. SSA does not periodically revise and reprint its public-use forms, (e.g., on an annual basis). This exemption was granted so that otherwise useable editions of forms would not be taken out of circulation because the expiration date had been reached. In addition, Government waste has been avoided because stocks of forms will not have to be destroyed and reprinted.
18. 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

Statistical methods are not used for this information collection.