

**Supporting Statement for Form SSA-704,
Certification of Contents of Document(s) or Record(s)**

**20 CFR sections 404.707, 404.715, 404.716, 404.720, 404.721, 404.723, 404.725,
404.727, 404.728, 404.730, 404.731, 404.732, 404.733, 404.735, 404.1370,
404.1371, 408.202 and 408.216**

OMB No. 0960-0689

A. Justification

1. *Section 205(a), 806(a) and (b), 1631(e)(1)(A) and (B), and 1631(f) of the Social Security Act* gives the Commissioner of Social Security the authority to establish procedures for securing evidence necessary for individuals to establish rights to Social Security benefits, including Title VIII, Special Veteran's Benefits, and Supplemental Security Income (SSI) payments. Some of the types of evidence needed are evidence of age, relationship, citizenship, marriage, death, and military service. *20 CFR sections 404.707, 404.715, 404.716, 404.720, 404.721, 404.723, 404.725, 404.727, 404.728, 404.730, 404.731, 404.732, 404.733, 404.735, 404.1370, 404.1371, 408.202 and 408.216* describe the information needed to establish age, citizenship, marriage, death, and military service. The form SSA-704 allows SSA employees, state record custodians, and other custodians of evidentiary documents to record information from documents and records to establish these types of evidence. *20 CFR 404.707* permits the documentation of evidence from certified copies of original records.
2. Information collected on the SSA-704 is used to establish such things as age, relationship, citizenship, marriage, death, military service, or to evaluate a family bible or other family record.
3. The SSA-704 is not currently scheduled for electronic implementation due to the low number of respondents (under 50,000 is considered "low"). Because of limited resources, we need to prioritize our higher volume forms for electronic implementation first. In addition, this form is an Agency-initiated form which SSA sends to the respondents only when necessary. It contains sensitive information. Until more secure methods exist to safeguard the personal information received from the respondents, we cannot make this form available electronically.
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. This collection does not have a significant impact on a number of small businesses or other small entities.
6. There are occasions where an authorized employee will not be able to photocopy records or documents. These are documents or records needed to establish age, relationship, citizenship,

marriage, death, and military service. In these instances an authorized employee or state record custodians or other custodians of documents or records can use the SSA-704 to certify the content of such documents or records. The form could not be used 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 first Federal Register notice was published on April 23, 2007 at 72 FR 20154. We have received no comments from the public as a result of this notice. The second notice was published on June 13, 2007 at 72 FR 32697. 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. Approximately 4,800 respondents will use the SSA-704. The average response time is 10 minutes for a total of 800 burden hours. The total burden is reflected as burden hours and no separate cost burden has been calculated. This is a small increase in the number published in the Federal Register notices as we discovered an incorrect figure.
13. There is no known cost burden to the respondents.
14. The annual cost to the Federal Government is approximately \$12,936.00. This estimate is a projection of the costs for printing and distributing the collection instrument and for collecting the information.
15. There are no changes in the public reporting burden.
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 has been reached. In addition, Government waste has been avoided because stock 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.