

Supporting Statement for Form SSA-4-BK
Application for Child's Insurance Benefits
20 CFR 404.350 – 404.368 and 404.603, CFR 414.350
OMB No. 0960-0010

A. Justification

1. Title II of the *Social Security Act (the Act)* provides for the payment of monthly benefits to the children of an insured retired, disabled, or deceased worker. *Section 202(d)* of the *Act (42 U.S.C. 404(d))* contains the conditions which must be met, including the requirement for the filing of an application. *20 CFR 404.350 – 404.368* and *404.603* of the *Code of Federal Regulations*, implement this authority. These sections of the regulations set forth the eligibility criteria for child's benefits, and require the filing of an application in order that a determination may be made on the applicant's eligibility for such benefits. In order for such a determination to be made, it is necessary to elicit from the applicant information as to date and place of birth, relationship, residence, etc. The form SSA-4-BK, Application for Child's Insurance Benefits, elicits this information.

Regulation *20 CFR 416.350* requires that we discuss the Supplemental Security Income (SSI) program with every Title II applicant who is within two months of age 65 or older or might qualify as a blind or disabled person and give the person a chance to file an application. If the individual does not file an SSI application when SSI is discussed, the filing of the Title II application is an oral inquiry for SSI. The question on the Title II application that asks if the individual wants to file for SSI serves as documentation of the Claimant's intent. It also eliminates the need for manually documenting the claimant's intent to file in the remarks portion of the application. The form SSA-4-BK is the application which meets these requirements as well.

2. The Social Security Administration (SSA) needs the information collected by the paper/electronic form SSA-4-BK to entitle children of living and deceased workers to monthly Social Security payments. The respondents are guardians completing the form on behalf of the children of living or deceased workers, or the children of living or deceased workers.
3. The information collected by the paper form SSA-4-BK is also collected electronically using SSA's Modernized Claims System (MCS). Approximately 95% of the data collection in claims for mother's and father's benefits is electronic. This is one of several of our basic retirement applications we need to convert from our legacy system to a newer technology; however, because of the sheer size of this project we are unable to project a firm completion date. Additional information technology, which would further reduce the burden, is not available at this time.

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 of information does not involve small businesses or other small entities.
6. The collection of this information must take place in order for a child to become entitled to benefits. If this information were not collected, SSA would be unable to entitle children of living and deceased workers to monthly Social Security payments. Since the information is only collected on an as needed basis, 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 an information collection to be conducted inconsistent with 5 CFR 1320.5.
8. The 60-day advance Federal Register Notice was published on February 14, 2007 at 72 FR 7107, and SSA has received no public comments. The second Notice was published on May 9, 2007, at 72 FR 26443. 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. Because of the dual-purpose nature of the SSA-4-BK, we have determined the following split public reporting burden. 95% of the responses are obtained electronically in the case of both life and death claims.

Type of Request	Number of Respondents	Frequency per Response	Average Burden per Response	Estimated Annual Burden
Life Claims	46,250	1	10 minutes	7,708
Life Claims—MCS	439,375	1	10 minutes	73,229
Life Claims—Signature Proxy	439,375	1	9 minutes	65,906
Death Claims	40,750	1	15 minutes	10,188

Death Claims— MCS	387,125	1	15 minutes	96,781
Death Claims— Signature Proxy	387,125	1	14 minutes	90,329
Totals	1,740,000			344,141

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 \$10,718,400. This estimate is a projection of the costs for printing and distributing the collection instrument, upkeep to the Modernized Claims System, and for collecting the information.
15. The decrease in the public reporting burden is due to an adjustment of the average burden per response. Previously we estimated the average burden per response in fractions of minutes. We have now rounded those fractions to whole numbers to make it easier for the public to estimate how much time it will take to respond.
16. The results of the information collected will not be published.
17. OMB has granted SSA an exemption from the requirement to print the reports clearance expiration date on its public use forms. SSA produces millions of these forms, many of which have a life cycle longer than that of an OMB clearance. SSA does not periodically (e.g., on an annual basis) revise and reprint its public-use forms. This exemption was granted to avoid confusion by having in circulation otherwise useable editions of forms obsolete only because the expiration date had been reached. In addition, government waste has been avoided because stocks of forms would not have to be destroyed and reprinted.
18. SSA is not requesting an exception to the certification requirements. Please note, however, that a statistical survey methodology is not used for this information collection.

B. Collections of Information Employing Statistical Methods

Statistical methods are not used for this information collection.