## Supporting Statement for Form SSA-5-F6 Application for Mother's or Father's Insurance Benefits 20 CFR 404.339-404.342, 20 CFR 404.601-404.603 OMB No. 0960-0003

## A. Justification

1. *Section* 202(*g*) of the *Social Security Act* (*the Act*) provides for the payment of monthly benefits to the widow or widower of an insured individual if such surviving spouse is caring for a child of the deceased worker, who is entitled to Social Security benefits. One of the statutory requirements to become entitled under *Section* 202(*g*) is that the claimant must file an application. Form SSA-5-F6, Application for Mother's or Father's Insurance Benefits, meets this requirement and obtains the information necessary for SSA to determine whether the applicant meets the provision of *Section* 202(*g*).

The regulatory requirements for implementing *Section 202(g)* of *the Act* are set forth in *20 CFR 404.339–404.342* and *20 CFR 404.601–404.603* of the *Code of Federal Regulations*. Among the requirements is filing an application so that SSA can make a determination on the eligibility of the applicant for monthly benefits. It is necessary to elicit information from the applicant about the date and place of birth, relationship, residence, etc., which is collected on the Application for Mother's or Father's Insurance Benefits.

- 2. The Social Security Administration (SSA) needs the information collected on the paper/electronic Form SSA-5-F6 to entitle an individual to mother or father's insurance benefits. The respondents are individuals caring for a child of the deceased worker who are applying for mother's or father's insurance benefits under the Old Age, Survivors, and Disability Insurance program.
- 3. The information collected on the paper Form SSA-5-F6 is also collected electronically using SSA's Modernized Claims System. Approximately 97 percent of the data collection in claims for mother and father's benefits is electronic.
- 4. The nature of the information SSA is collecting and the manner in which SSA is collecting it preclude duplication. There is no other collection instrument used by SSA that collects data similar to that collected here.
- 5. This collection has no impact on small businesses or other small entities.
- 6. The collection of this information takes place based upon the need of the applicant to apply for benefits. Failure to collect this information would preclude entitlement to an otherwise eligible individual. Therefore, SSA cannot collect the information less frequently. There are no technical or legal obstacles that prevent burden reduction.
- 7. There are no special circumstances that would cause SSA to collect this information in a manner that is not consistent with 5 CFR 1320.5.

- 8. SSA published the 60-day advance Federal Register Notice on October 27, 2008 at FR 63761 and SSA has received no public comments. We published the 30-day Federal Register Notice on January 15, 2009 at 74 FR 2643. 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 on this form 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. (Privacy Act), and OMB Circular No. A-130.
- 11. The information collection does not contain any questions of a sensitive nature.
- 12. Form SSA-5-F6 will be used by approximately 53,700 respondents annually. Of this total, 97 percent of the respondents (52,089) will respond through the Modernized Claims System (MCS) and 50 percent of the MCS respondents (26,044) will use Signature Proxy. Using Signature Proxy reduces the burden by 1 minute per respondent. Shown below is the breakdown. There are no respondents in private sector, State/local/tribal government, or Federal government. The total burden represents burden hours, and we did not calculate a separate cost burden.

Collection	Number of	Estimated	Burden Hours
Method	Respondents	Completion Time	
MCS	26,045	15 minutes	6,511
MCS/Signature	26,044	14 minutes	6,077
Proxy*			
Paper	1,611	15 minutes	403
Totals	53,700		12,991

\*Under the Signature Proxy process, respondents give their "signature" by verbal consent for telephone claims or by clicking a button for Internet claims. Signature Proxy is an alternative to the traditional pen and ink or "wet" signature, and it eliminates the need to retain paper applications in most circumstances by allowing the technician to process the application on the claimant's behalf, without a signature. In most instances, Signature Proxy allows SSA to store and process the entire benefit application electronically, thus reducing costs associated with mailing and storing physical files. In addition, the adoption of Signature Proxy supports faster processing of claims and improves service to the public by eliminating the need to mail the application to the claimant and wait for them to sign and return it.

- 13. There is no known cost burden to the respondents.
- 14. The annual cost to the Federal government for the paper form is approximately \$413,490. This estimate is a projection of the costs for printing and distributing the collection instrument and for collecting the information.
- 15. The increase in the public reporting burden is due to an increase in the number of

applicants for mother's or father's benefits. Further, before ROCIS, we were not

able to

- separate the information collections, therefore, ROCIS shows a change in the burden due to the separation; however, there is no decrease in the burden.
- 16. SSA will not publish the results of the information collection on the paper/electronic form.
- 17. OMB exempted SSA from publishing the expiration date for OMB approval on its forms. SSA produces millions of public-use forms, many of which have a life cycle longer than that of an OMB clearance. SSA does not periodically revise and reprint its public-use forms (e.g., on an annual basis). OMB granted this exemption so that SSA would not have to stop using otherwise useable editions of forms with outdated expiration dates. In addition, we avoid government waste because we do not have to destroy and reprint stocks of forms.
- 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. <u>Collections of Information Employing Statistical Methods</u>

SSA does not use statistical methods for this information collection.