Supporting Statement for Form SSA-7-F6, Application for Parent's Insurance Benefits 20 CFR 404.370, .371, .373, .374, .601-.603 OMB No. 0960-0012

A. Justification

1. Section 202(h) of the Social Security Act (the Act) sets forth the conditions a claimant must meet in order to be eligible to receive the payment of monthly benefits to a parent of a deceased worker. The Social Security Administration (SSA) uses Form SSA-7-F6, Application for Parent's Insurance Benefits, to obtain the information necessary to determine whether the claimant meets the provisions of Section 202(h).

SSA has the authority to collect this information under 20 CFR 404.370, .371, .373, .374 and 404.601-404.603. These Sections prescribe the eligibility criteria and application instructions for these benefits. In order for SSA to determine an applicant's eligibility, the applicant must provide SSA with information as to their date and place of birth, relationship, residence, etc. The SSA-7-F6 elicits this information.

- 2. SSA needs the information collected by this form to entitle an individual to a parent's insurance benefits. The consequence of not collecting this information would be to preclude entitlement to an eligible individual.
- 3. Improved information technology that would reduce the burden is not available. The information collected by the paper version of this form is also collected electronically during a personal or telephone interview using SSA's Modernized Claims System (MCS). Approximately 99 percent of the data collected are via the electronic method.
- 4. The nature of the information SSA is collecting and the manner in which we are collecting it preclude duplication. There is no other form SSA uses that collects data similar to that collected by form SSA-7-F6.
- 5. This information collection does not apply to small business or other small entities.
- 6. SSA needs the information on this form to determine the eligibility of the applicant to a parent's insurance benefits. Without the information collected on the form, SSA would be unable to pay benefits. 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 5CFR 1320.5.

- 8. SSA published the 60-day advance Federal Register Notice on December 11, 2008 at 73 FR 75488 and SSA has received no public comments. We published the 30-day Federal Register Notice on February 17, 2009 at 74 FR 7506. There have been no outside consultations with members of the public.
- 9. SSA provides no payment or gifts to the respondents.
- 10. The information provided on this form is protected and held confidential in accordance with 42 U.S.C. 1306, 20 CFR 401 and 402, U.S.C. 552 (Freedom of Information Act), U.S.C. 552a (Privacy Act of 1974) and OMB Circular 1 No. A-130.
- 11. The information collection does not contain any questions of a sensitive nature.
- 12. Approximately 315 individuals/household respondents will use the SSA-7-F6 annually. Of this total, we estimate that 99 percent (311) of the respondents apply through MCS and 50 percent of the MCS respondents use Signature Proxy (158). Using Signature Proxy reduces the burden by 1 minute per respondent. Shown below is the breakdown. The total burden reflects burden hours and SSA has not calculated a separate cost burden.

Collection	Number of	Estimated	Burden Hours
Method	Respondents	Completion Time	
MCS	153	15 minutes	38
MCS/Signature	158	14 minutes	37
Proxy*			
Paper	4	15 minutes	1
Totals	315		76

As a result of the Signature Proxy initiative, SSA has attained a 2.59 burden hour reduction in the SSA-7 collection activity.

*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 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 form to the claimant and wait for them to sign and return it.

- 13. There is no known cost burden to the respondents.
- 14. Using SSA's standard cost formula, the annual cost to the Federal government is \$1,455. This estimate is a projection of printing and distribution cost for the form.
- 15. The decrease in the public reporting burden is due to a decrease in the number of applicants for parent's benefits.
- 16. SSA will not publish the results of the information collection.
- 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 approval. 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 expirations 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>Collection of Information Employing Statistical Methods</u>

SSA does not use statistical methods for this information collection.