

**Supporting Statement for
SSA 2000-F6, Application for Special Benefits for World War II Veterans
20 CFR 408, Subparts B, C, & D
OMB No. 0960-0615**

A. Justification

1. Authoring Laws and Regulations- *Title VIII of the Social Security Act (the Act)* provides for payment of benefits to certain World War II veterans who reside outside the United States. *Section 802 of the Act* explains the requirements an individual must meet to qualify for these Special Veterans Benefits (SVB); *Section 803* explains that an individual must be residing outside the United before he or she can begin receiving SVB; *Section 804* explains the events that will prevent an individual from qualifying for SVB; and *Section 806* authorizes the Commissioner of Social Security to prescribe the requirements relating to the filing of applications and the furnishing of information and other material necessary for SSA to verify that a claimant meets all the requirements for special veterans benefits (SVB).
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- A. *20 CFR 408.202(d), 408.210, 408.230(a), 408.305, 408.310, and 408.315 of the Code of Federal Regulations* require an individual to file an application for SVB.
 - B. *20 CFR 408.232(a)* requires an individual to tell us when he or she begins residing outside the United States, since SVB becomes payable only after foreign residence begins.
 - C. *20 CFR 408.320* requires an individual filing an application on behalf of the claimant to furnish evidence that he or she has the authority to do so.
 - D. *20 CFR 408.340* permits SSA to establish a claimants filing date based on a written statement indicating intent to claim SVB.
 - E. *20 CFR 408.345* permits us to establish a filing date based on an oral inquiry about SVB.
 - F. *20 CFR 408.351(d) and (f)* require the submission of evidence that misinformation from SSA precluded an individual from filing for benefits at an earlier date before we will establish the earlier filing date.
 - G. *20 CFR 408.355(a)* requires an individual who decides not to pursue his or her SVB claim after filing an application to file a written request for withdrawal of the application.
 - H. *20 CFR 408.360(a)* requires an individual who decides to cancel a withdrawal request to submit a written request. *20 CFR 408.404(c)* requires a claimant to explain why he or she needs more time to give us information we need to process the claim.

- I.** *20 CFR 408.410 and 408.412* require a claimant to submit evidence of age.
- J.** *20 CFR 408.420(a) and (b)* require a claimant to furnish proof of his or her WWII military service.
- K.** *20 CFR 408.430 and 408.432* require a claimant to submit evidence of any other benefit income he or she receives.
- L.** *20 CFR 408.435(a), (b), and (c)* require a claimant to furnish proof that he or she has begun residing outside the United States.
- M.** *20 CFR 408.437(b), (c), and (d)* require an individual who believes his or her SVB payments should continue after returning to the United States for more than one month to furnish evidence of the circumstances that prevented a timely return to his or her foreign residence.

- 2. In the case of the information collection requirements in *20 CFR 408.202(d), 408.210, 408.230(a), 408.305, 408.310, and 408.315*, the individual must file an application for SVB on the SSA-2000-F6 (Application for Special Benefits for World War II Veterans).

In the case of the information collection requirements in *20 CFR 408.232(a), 408.320, 408.340, 408.345, 408.351(d) and (f), 408.355(a), 408.360(a), and 408.404(c)*, the information will generally be recorded on the SSA-795 (Statement of Claimant or Other Person, 0964-0045), although any signed and dated statement from the individual will suffice.

In the case of the information collection requirements in *20 CFR 408.410 and 408.412, 408.420(a) and (b), 408.430, 408.432, 408.435(a), (b), and (c), and 408.437(b), (c), and (d)*, the claimant will be required to submit documentary evidence that each requirement is met; we will photocopy the evidence and make the copy a part of the claims file.

In the case of each section, personnel in SSA field offices will collect the information, the Veterans Affairs Regional Office in Manila, and U.S. Embassies and consulates. We will use the information to determine whether an individual can qualify for and become entitled to SVB. Respondents are individuals outside the U.S. who are applying for SVB for himself or herself or for someone else under Title VIII of the Social Security Act. SSA notifies Respondents how they need to respond to regulations through pamphlets, notices, fact sheets, publications and SSA website.

- 3. Due to the small number of responses, which will continue to decline, we will not collect the information electronically.

4. The nature of the information we are collecting and the manner in which we are collecting it preclude duplication. SSA does not use another collection instrument to collect similar data.
5. This collection does not affect small businesses or other small entities.
6. If SSA did not collect the information, we would not be able to establish if claimants' meets the requirements for SVB qualification and entitlement. In such a case, we would not be able to approve their claim for benefits; therefore, we cannot collect this information less frequently.
7. There are no special circumstances that would cause SSA to conduct this information collection in a manner inconsistent with 5 CFR 1320.5.
8. The 60-day advance Federal Register Notice published on April 24, 2009, at 74 FR 18782, and SSA received no public comments. The second Notice published on June 25, 2009, at 74 FR 30353. SSA did not consult members of the public in the development of this form.
9. SSA provides no payment or gifts to the respondents.
10. SSA protects and holds confidential the information it is requesting 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. **Estimates of Public Reporting Burden-** See the chart below:

The public reporting burden is shown on the following chart:

Section number	Number of respondents	Frequency of Response	Average burden per response (mins.)	Estimated annual hour burden
§408.202(d); §408.210; §408.230(a); §408.305; §§408.310-.315 (SSA-2000-F6)	100	1	20	33
§408.420(a), (b)	71	1	15	18
§§408.430 & .432	66	1	30	33

§408.435(a), (b),(c)	71	1	15	18
Totals	308			102

The total burden represents burden hours, and SSA did not calculate a separate cost burden.

13. There is no known cost burden to the respondents.
14. The annual cost to the Federal Government is approximately \$902.00. This estimate is a projection of the costs for printing and distributing the collection instrument, and for collecting the information.
15. The total number of respondents and burden hours has decreased. There is a decrease in the annual reporting burden for this collection, because there is a decrease in the number of respondents who apply for SVB. The universe of potential applicants is limited, declining because most applicants who meet the eligibility requirements have already filed for benefits under this provision, and there are fewer applicants who meet the requirement of having attained age 65 or older in 12/99. The decreasing trend in the annual reporting burden will continue.
16. SSA will not publish the results of the information collection.
17. OMB exempted SSA from the requirement to print the OMB approval expiration date 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). OMB granted this exemption so the agency would not have to discontinue using otherwise useable editions of forms with outdated expiration dates. In addition, SSA avoids Government waste, because we will 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. Collections of Information Employing Statistical Methods

SSA is not using statistical methods for this collection.