

**Supporting Statement for FORM SSA-2512
PRE-1957 MILITARY SERVICE
FEDERAL BENEFIT QUESTIONNAIRE
20 CFR 404.1301-404.1371**

OMB No. 0960-0120

A. Justification

1. Introduction/Authoring Laws and Regulations

SSA uses form SSA-2512 Pre-1957 Military Service Federal Benefit Questionnaire to grant gratuitous military wage credits. The authority to collect the information requested on Form SSA-2512 is contained in *Sections 217(a) through (e)* of the *Social Security Act* and in *20 CFR 404.1301-404.1371* of the *Code of Federal Regulations*. The Social Security Administration (SSA) may grant gratuitous military wage credits for active military service (under certain conditions) during the period September 12, 1940 through December 31, 1956, if no other Federal agency (except the Veterans Administration) has credited the service for benefit eligibility or computation purposes. This OMB clearance request is a renewal without changes to an existing collection.

2. Description of Collection

SSA uses the information to collect specific information about other Federal, military or civilian benefits when the applicant indicates both pre-1957 military service and the receipt of a Federal benefit. SSA uses the information collected from form SSA-2512 in the claims adjudication process to grant gratuitous military wage credits, when applicable. We use the paper form SSA-2512 to solicit sufficient information to make a determination of eligibility. Respondents must complete this collection to receive gratuitous military wage credits. The respondents are applicants for Social Security benefits on a record where the wage earner has pre-1957 military service. Respondents self complete the form with information in their possession.

3. Use of Information Technology to Collect the Information

Improved information technology that would reduce the burden is not available, because of the low volume of usage of the SSA-2512. SSA determined that this form not be a candidate for compliance with the requirements that SSA collect data through the Internet. Presently there are still no plans to build an Internet based collection of data for this application due to the decreasing number of respondents. SSA did not create an electronic version of form SSA-2512 under the agency's Government Paperwork Elimination Act (GPEA) plan because only 5,000 respondents complete the form. This is less than the GPEA cut-off of 50,000.

4. Why We Cannot Use Duplicate Information

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 obtain similar data.

5. Minimizing Burden on Small Respondents

The collection does not have a significant impact on a substantial number of small businesses or other small entities.

6. Consequence of Not Collecting Information or Collecting it Less Frequently

If SSA did not collect this information, then we would not be able to determine if the receipt of other Federal benefits permits or bars the granting of gratuitous wage credits in accordance with applicable laws and regulations. In addition, since the collection of this information takes place only when necessary, we cannot collect it less frequently. There are no technical or legal obstacles that prevent burden reduction.

7. Special Circumstances

There are no special circumstances that would cause SSA to conduct this information collection in a manner inconsistent with 5 CFR 1320.5.

8. Solicitation of Public Comment and Other Consultations with the Public

SSA published the 60-day advance Federal Register Notice published on October 26, 2009 at 74 FR 55080, and we received no public comments. The second Notice published on December 28, 2009, at 74 FR 68655. We did not consult with the public in the revision of this form. —

Note: This is a correction notice. SSA published this information collection as an extension on October 26, 2009 at 74 FR 55080. Since we are revising the Privacy Act Statement, this is now a revision of an OMB-approved information collection.

9. Payment or Gifts to Respondents

SSA does not provide payments or gifts to the respondents.

10. Assurances of Confidentiality

SSA protects and holds confidential the information it collects 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. Justification for Sensitive Questions

The information collection does not contain any questions of a sensitive nature.

12. Estimates of Public Reporting Burden

Approximately 5,000 respondents take 10 minutes each to complete form SSA-2512 each year. Accordingly, the burden is 833 hours. This figure represents burden hours, and we did not calculate a separate cost burden.

13. Annual Cost to the Respondents (Other)

This collection does not impose a known cost burden to the respondents.

14. Annual Cost To Federal Government

The annual cost to the Federal Government is approximately \$5,700. This estimate is a projection of the cost for printing and distributing the collection instrument and for collecting the information.

15. Program Changes or Adjustments to the Information Collection Request

There are no changes to the public reporting burden.

16. Plans for Publication Information Collection Results

SSA will not publish the results of the information collection.

17. Displaying the OMB Approval Expiration Date

OMB granted SSA an exemption from the requirement to print the OMB expiration date on its program forms. SSA produces millions of public-use forms with life cycles exceeding those of an OMB approval. Since SSA does not periodically revise and reprint its public-use forms (e.g., on an annual basis), OMB granted this exemption so SSA would not have to destroy stocks of otherwise useable forms with expired OMB approval dates, avoiding Government waste.

18. Exceptions to Certification Statement

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 does not use statistical methods for this information collection.