

**SUPPORTING STATEMENT FOR FORM SSA-24
APPLICATION FOR SURVIVOR'S BENEFITS
20 CFR 404.611(a) and (c)**

OMB No. 0960-0062

A. Justification

- 1. Introduction/Authoring Law/Regulations** - Surviving family members of deceased armed services personnel can file at the Social Security Administration (SSA) or the Veterans Administration (VA) for consideration for benefits by both agencies. Section 202(o) of the *Social Security Act* authorizes the agency to collect information for armed services personnel survivors for benefits determination purposes. Sections 20 CFR 404.611(a) and (c) of the *Code of Federal Regulations* discuss general Social Security benefits application rules. Section 38 U.S.C. 5105 provides for a joint SSA-VA application for survivors of deceased armed services personnel.
- 2. Description of Collection** - When surviving family members of deceased armed services personnel apply first to the VA for benefits, they complete Form SSA-24, Application for Survivors' Benefits, as part of the application process. The VA then forwards the completed form to SSA for processing. If applicants previously filed for benefits at SSA and the VA submits to us a completed Form SSA-24 for that applicant, SSA simply disregards it since we already have the information on file. The respondents are survivors of deceased armed services personnel who are applying for benefits at the VA.
- 3. Use of Information Technology to Collect the Information** - A portable document format or PDF copy of this form is available on the VA's website. SSA did not create an electronic version of Form SSA-24 under the agency's Government Paperwork Elimination Act (GPEA) plan because only 3,200 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 SSA is collecting and the manner in which we are collecting it preclude duplication. The agency does not use another collection instrument to collect similar data.
- 5. Minimizing Burden on Small Respondents** - This collection does not affect small businesses or other small entities.
- 6. Consequence of Not Collecting Information or Collecting it Less Frequently** - If SSA did not use this form, we would not have an instrument for a joint VA-SSA application, which would violate the regulatory provisions cited in Question #1. Because we only collect the information once, 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 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 for this collection on January 6, 2011 at 76 FR 817, and we did not receive any public comments. We published the 30-day Federal Register Notice on March 25, 2011, at 76 FR 016849. If we receive any public comments in response to this Notice, we will forward them to OMB. We did not consult with outside members of the public in the development or maintenance of this form.
9. **Payment or Gifts to Respondents** - SSA does not provide payments or gifts to the respondents.
10. **Assurances of Confidentiality** - We protect and hold confidential the information we are 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. **Justification for Sensitive Questions** – The information collection does not contain any questions of a sensitive nature.
12. **Estimates of Public Reporting Burden** - Approximately 3,200 respondents take 15 minutes each to complete Form SSA-24 each year. Accordingly, the burden is 800 hours. This figure represents burden hours, and we did not calculate a separate cost burden.
13. **Annual Cost to the Respondents** – There is no known cost burden to the respondents.
14. **Annual Cost to the Federal Government** - The annual cost to the Federal Government for this collection is approximately \$4,298. This estimate is a projection of the costs for printing and distributing the collection instrument, and for processing the information once the VA sends it to us.
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

We do not use statistical methods for this information collection.