

**Supporting Statement for
Form 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. Introduction/Authoring Laws and Regulations** - Title VIII of the *Social Security Act (Act)* provides for payment of benefits to certain World War II (WWII) veterans who reside outside the United States.

Pertinent sections of the Act include the following:

- section 802 of the Act explains the requirements an individual must meet to qualify for these Special Veterans Benefits (SVB);
- section 803 explains how individuals residing outside the United States before they 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 the Social Security Administration (SSA) to prescribe the requirements for filing applications and furnishing information and other materials SSA needs to verify that a claimant meets all the requirements for special veterans benefits (SVB).

The following sections from the Code of Federal Regulations give SSA the authority to collect the information.

- 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.
- 20 CFR 408.420(a) and (b) require a claimant to furnish proof of WW II military service.
- 20 CFR 408.430 and 408.432 require a claimant to submit evidence of any other benefit income received.

- 2. Description of Collection** – 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 Form SSA-2000-F6 (Application for Special Benefits for World War II Veterans).

In the case of the information collection requirements in 20 CFR 408.420(a) and (b); 408.430, 408.432, 408.435(a), (b), and (c) the claimant must submit documentary evidence that each requirement is met; we photocopy the evidence and make the copy part of the claimant file.

Personnel in SSA field offices, the Veterans Affairs Regional Office in Manila, and U.S. Embassies and consulates collect the information. We use the information to determine whether individuals can qualify for and become entitled to SVB. Respondents are individuals outside the United States who are applying for SVB for themselves or for someone else under Title VIII of the Act.

- 3. Use of Information Technology to Collect the Information** - Due to the small number of responses, which will continue to decline, we will not collect the information electronically.
- 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 collect similar data.
- 5. Minimizing Burden on Small Respondents** - This collection does not affect small businesses or other small entities.
- 6. Consequences of Not Collecting Information or Collecting it Less Frequently** - If SSA did not collect the information, we would be unable to determine if claimants meet the requirements for SVB. In such cases, we would not be able to approve their claims for benefits; therefore, we cannot collect this information 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 on April 2, 2015, at 80 FR 17817, and SSA received no public comments. We published the second Notice published on June 23, 2015, at 80 FR 36031. If we receive any comments in response to the second Notice, we will forward them to OMB. There have been no outside consultations with members of the public.
- 9. Payment or Gifts to Respondents** - SSA provides no payment or gifts to the respondents.
- 10. Assurance of Confidentiality** - SSA protects and holds confidential the information we collect 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 -

Regulations Sections and Modality of Completion	Number of Respondents	Frequency of Response	Average Burden per Response (minutes)	Estimated Total Annual Burden (hours)
SSA-7	50	1	20	17
§408.420 (a), (b)	35	1	15	9
§408.430 & .432	33	1	30	17
§408.435 (a), (b), (c)	35	1	15	9
Totals	153			52

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 is approximately \$517. This estimate is a projection of the costs for printing and distributing the collection instrument, and for collecting the information.

15. Program Changes or Adjustments to the Information Collection Request - 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 and 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. The decreasing trend in the annual reporting burden will continue.

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 exempted SSA from the publishing the expiration date for OMB approval 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 SSA this exemption so we 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. Exception 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 is not using statistical methods for this collection.