

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

The Social Security Administration (SSA) uses Form SSA-2512, Pre-1957 Military Service Federal Benefit Questionnaire, to grant gratuitous military wage credits. Sections 217(a) through (e) of the *Social Security Act* and sections 20 CFR 404.1301-404.1371 of the *Code of Federal Regulations* contain the authority to collect the information we request on the form. These rules describe the circumstances allowing us to grant the military wage credits.

2. Description of Collection

SSA may grant gratuitous military wage credits for active military or naval service (under certain conditions) during the period September 16, 1940 through December 31, 1956, if no other Federal agency (other than the Veterans Administration) credited the service for benefit eligibility or computation purposes. We use Form SSA-2512 to collect specific information about other Federal, military, or civilian benefits the wage earner may receive when the applicant indicates both pre-1957 military service and the receipt of a Federal benefit. SSA uses the data in the claims adjudication process to grant gratuitous military wage credits when applicable, and to solicit sufficient information to determine eligibility. Respondents are applicants for Social Security benefits on a record where the wage earner claims pre-1957 military service.

3. Use of Information Technology to Collect the Information

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. Presently there are still no plans to build an Internet based collection of data for this application due to the decreasing number of respondents.

4. Why We Cannot Use Duplicate Information

The nature of the information we collect and the manner in which we collect it preclude duplication. SSA does not use another collection instrument to obtain similar data.

5. Minimizing Burden on Small Respondents

The collection does not significantly affect small businesses or other small entities.

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

If SSA did not collect this information, 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

The 60-day advance Federal Register Notice published on September 25, 2015, at 80 FR 57907, and we received no public comments. SSA published the second Notice on December 2, 2015, at 80 FR 75484. If we receive comments in response to the 30-day Notice, we will forward them to OMB. We did not consult with the public in the revision of this form. —

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 annually. 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.