# Supporting Statement for Form SSA-2519

# Child Relationship Statement

# 20 CFR 404.355 & 404.731

# OMB No. 0960-0116

**A. Justification**

1. **Introduction/Authoring Laws and Regulations**

Section *216(h)(3)* of the *Social Security Act (Act)* provides the Social Security Administration (SSA) the criteria to use to determine entitlement of children to Social Security benefits under the deemed child provision. *20 CFR 404.355* and *404.731* of the *Code of Federal Regulations* gives SSA the authority to collect this information.

1. **Description of Collection**

SSA uses Form SSA-2519 to collect the information necessary to determine whether children meet the entitlement requirements for Social Security benefits under the deemed child provision of the *Act*. SSA may deem a child to an insured individual if: (1) the insured individual presents SSA with satisfactory evidence of parenthood, and was living with, or contributing to, the child’s support at certain specified times; or (2) the insured individual (a) acknowledged the child in writing; (b) was court decreed as the child’s parent; or (c) was court ordered to support the child. SSA collects this information through in-person interviews; over the phone; or through paper Form SSA-2519. The respondents are people with knowledge of the relationship between certain individuals filing for Social Security benefits and their alleged biological children.

1. **Use of Information Technology to Collect the Information**

SSA did not create an electronic version of Form SSA-2519 under the agency’s Government Paperwork Elimination Act (GPEA) plan because the number of respondents for this collection is at the 50,000 respondent threshold for electronic implementation.

1. **Why We Cannot Use Duplicate Information**

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

1. **Minimizing Burden on Small Respondents**

This collection does not affect small businesses or other small entities.

1. **Consequence of Not Collecting Information or Collecting it Less Frequently**

If we did not collect this information, we may deny possible entitlement to a child under the deemed child provision of the *Act.* Because we collect this information on an as needed basis, we cannot collect it less frequently. There are no technical or legal obstacles to burden reduction.

1. **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.

1. **Solicitation of Public Comment and Other Consultations with the Public**

The 60-day advance Federal Register Notice published on November 9, 2018, at

83 FR 56133, and we received no public comments. The 30-day FRN published on January 25, 2019 at 84 FR 371. If we receive any comments in response to this Notice, we will forward them to OMB.

1. **Payment or Gifts to Respondents**

SSA does not provide payments or gifts to the respondents.

1. **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.

1. **Justification for Sensitive Questions**

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

1. **Estimates of Public Reporting Burden**

|  |  |  |  |  |
| --- | --- | --- | --- | --- |
| **Modality of Completion** | **Number of Respondents** | **Frequency of Response** | **Average Burden Per Response**  **(minutes)** | **Estimated Total Annual Burden**  **(hours)** |
| SSA-2519 | 50,000 | 1 | 15 | 12,500 |

The total burden for this ICR is **12,500** hours. We based this figure on current management information data. This figure represents burden hours, and we did not calculate a separate cost burden.

1. **Annual** **Cost to the Respondents (Other)**

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

1. **Annual Cost to Federal Government**

The annual cost to the Federal Government is approximately $77,000. This estimate accounts for costs from the following areas: (1) designing, printing, and distributing the form; and (2) SSA employee (e.g., field office, 800 number, DDS staff) information collection and processing time.

1. **Program Changes or Adjustments to the Information Collection Request**

There are no changes to the public reporting burden.

1. **Plans for Publication Information Collection Results**

SSA will not publish the results of the information collection.

1. **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.

1. **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.