Addendum to Supporting Statement for Form SSA-10-BK Application for Widow's or Widower's Insurance Benefits 20 CFR 404.335-404.338, and 404.603 OMB No. 0960-0004

Revisions to Form SSA-10-BK

• **Change 1:** On Page 1, in the instructions, we removed the "?" between the second and third sentence. Instead, there should be a paragraph break.

Justification 1: The "?" appears to have been inserted due to a formatting error, and this change corrects the error.

• **Change 2:** On Page 1, in the instructions, we removed the "?" between the fourth and fifth sentence. Instead, there should be a paragraph break.

Justification 2: The "?" appears to have been inserted due to a formatting error, and this change corrects the error.

• **Change 3:** On Page 1, we inserted dividing lines, indicated on the attached draft, both above and below question 1(b).

Justification 3: The dividing lines ensure consistent formatting of the form.

• **Change 4:** On Page 1, question 6(a), we revised the language as follows:

From:

supplemental security income

To:

Supplemental Security Income

Justification 4: The name of SSI should be capitalized, and consistent with the wording in question 17(a).

• **Change 5:** On Page 2, Question 11, we revised the language as follows:

From:

I am not submitting evidence of the deceased's earnings that are not yet on his/her earnings record. I understand that these earnings will be included automatically within 24 months, and retroactivity.

To:

I am not submitting evidence of the deceased's earnings that are not yet on his/her earnings record. I understand that these earnings will be included automatically within 24 months, and any increase in my benefits will be paid with full retroactivity.

<u>Justification 5:</u> This sentence appears to be truncated. The language now matches the same language that appears on SSA-7 (OMB No. 0960-0012 - Application for Parent's Insurance Benefits).

 <u>Change 6:</u> On Page 2, we adjusted the typographic alignment to the sub-heading, "INFORMATION ABOUT THE DECEASED'S MARRIAGE(S)," between Question 11 and Question 12 to be left aligned.

Justification 6: For formatting consistency, we left-align all sub-headings.

• **Change 7:** On Page 2, we inserted a dividing line, as indicated on the attached draft, below the text "Spouse's Social Security Number (*If none or unknown*, *so indicate*)" and above part (b) of Question 12.

Justification 7: The dividing line ensures consistent formatting of the form.

• **Change 8:** On Page 2, in instructions following Question 12(b), we revised the language as follows:

From:

USE "REMARKS" SPACE ON BACK PAGE FOR INFORMATION ABOUT ANY OTHER PREVIOUS MARRIAGE AS DESCRIBED IN 12b.

To:

USE "REMARKS" SPACE ON BACK PAGE FOR INFORMATION ABOUT ANY OTHER MARRIAGE AS DESCRIBED IN 12b.

Justification 8: We deleted the word "previous" from the sentence because the marriages reported in 12(b) can be marriages that occurred either before or after the claimant's marriage to the deceased. The word previous implies only those that occurred before and could elicit only a partial response.

• **Change 9:** On Page 2, question 14(b), we revised the language as follows:

From:

Was a public record of your birth made before age 5?

To:

Was a public record of your birth made before age 5? (If yes, go to item 15.)

Justification 9: Per GN 00302.057, if the answer to the availability of a public birth record is yes, then we do not ask about a religious record. The revised language indicates that the claimant should move to the next item if answering yes, thereby skipping the question about a religious record.

• **Change 10:** On page 3, Question 15, we revised the formatting as follows:

From:

15. INFORMATION ABOUT YOUR MARRIAGE(S)

(a) Enter information about your marriage to the deceased.

To:

INFORMATION ABOUT YOUR MARRIAGE(S)

15. (a) Enter information about your marriage to the deceased.

Justification 10: The bolding of the sub-heading and the dividing line underneath will match the formatting of the questions about the deceased's marriages on Page 2.

• **Change 11:** On Page 3, question 15 (b), we revised the language as follows:

From:

(b) If you remarried **after** the marriage shown in 15. (a). enter information about the last marriage.

To:

(b) If you remarried **after** the marriage shown in 15. (a), enter information about the last marriage.

Justification 11: There is currently a period after 15. (a), and should instead be a comma.

• **Change 12:** On Page 3, question 15(c), we will indent the text to match the alignment of (a) and (b) in the previous parts of the question.

Justification 12: This change is to ensure formatting consistency on the form.

 Change 13: On Page 3, we have adjusted the typographic alignment for both sub-headings ("USE 'REMARKS' SPACE ON BACK PAGE FOR INFORMATION ABOUT ANY OTHER MARRIAGE AS DESCRIBED IN 15c." and "IF YOU ARE APPLYING FOR SURVIVING DIVORCED SPOUSES'S BENEFITS, OMIT 16 AND GO ON TO ITEM 17."), between Question 15(c) and Question 16, to left align.

Justification 13: For formatting consistency, we left-align all sub-headings.

• **Change 14:** On Page 3, Question 16(a), we revised the language following the "Yes" check box as follows:

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From:

(If "Yes," skip to item 17.)

To:

(If "Yes," go to item 17.)
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<u>Justification 14:</u> For language consistency, we use the term "go to" in our instructions for navigating the form rather than the term "skip to."

• **Change 15:** On Page 3, Question 16(a), we revised the language following the "No" check box as follows:

From:

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No(If "No," answer (b).)
To:

(If "No," answer (b).)
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Justification 15: We removed the extra "No" before the parentheses.

• **Change 16:** On Page 3, Question 17(a), we revised the language following the "Yes" check box as follows:

From:

```
(If "Yes," skip to item 17.)

To:

(If "Yes," answer (b) and (c).)
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<u>Justification 16:</u> The current instruction is incorrect. If a claimant answers "Yes," then we require a response to the subsequent parts of the question.

| • | Change 17: On Page 3, Question 17(a), we revised the language following the "No" check box as follows: |
|---|--|
| | From: |
| | (If "No," answer (b).) |
| | To: |
| | (If "No," go to item 18.) |
| | <u>Justification 17:</u> The current instruction is incorrect. If a claimant answers "No," the claimant should move on to item 18. |
| • | Change 18: On Page 3, Question 17(c), we revised the language of the question as follows: |
| | From: |
| | (c) Enter Social Security Number of person named in (b). (if unknown, so indicate) |
| | To: |
| | (c) Enter Social Security Number of person named in (b). <i>If unknown, check this box</i> \square |
| | Justification 18: These changes ensure consistency with the way that we ask the same question pertaining to the deceased previously in Question 6(c). |
| • | Change 19: On Page 4, we extended the dividing line above Question 19, inserted dividing lines above Questions 20 and 21(a), and indented the dividing line above Question 21(b). |
| | <u>Justification 19:</u> The dividing lines ensure consistent formatting of the form. |
| • | <u>Change 20:</u> On Page 4, we adjusted the typographic alignment to the sub-heading, "COMPLETE ITEM 23 ONLY IF YOU ARE WITHIN 3 MONTHS OF AGE 65 OR OLDER," within the MEDICARE INFORMATION section to left align. |
| | <u>Justification 20:</u> For formatting consistency, we left-align all sub-headings. |
| • | Change 21: On Page 5, Question 24(b), we revised the language as follows: |
| | From: |
| | *Enter the appropriate monthly limit after reading the information, "How Work Affects Your Benefits." |
| | To: |

*Enter the appropriate monthly limit after reading, "How Work Affects Your Benefits" (*Publication No. 05-10069*).

Justification 21: The current language does not provide indication to the claimant that "How Work Affects Your Benefits" is an SSA publication.

• **Change 22:** On Page 5, Question 25(b), we revised the language as follows:

From:

*Enter the appropriate monthly limit after reading the information, "How Work Affects Your Benefits."

To:

*Enter the appropriate monthly limit after reading, "How Work Affects Your Benefits" (*Publication No. 05-10069*).

<u>Justification 22:</u> The current language does not provide indication to the claimant that "How Work Affects Your Benefits" is an SSA publication.

• **Change 23:** On Page 5, Question 28, we included the following language:

From:

28.

To:

28. After reading the information on Page 8, check one of the following:

<u>Justification 23:</u> This instruction reemphasizes the need to read the information on Page 8 while also ensuring that there is an instruction following the question number.

• Change 24: On Page 6, we bolded the wording for "SIGNATURE OF THE APPLICANT."

Justification 24: The bolding of the section draws the applicant's attention to it.

• **Change 25:** On Page 6, for both witness signature sections ("1. Signature of Witness" and "2. Signature of Witness), we revised the address language as follows:

From:

Address (Number and street, City, State and zip Code)

To:

Address (Number and Street, City, State and ZIP Code)

Justification 25: We needed to capitalize the words Street and ZIP.

• **Change 26:** We are revising the Privacy Act Statement on this form.

Justification 26: SSA's Office of the General Counsel is conducting a systematic review of SSA's Privacy Act Statements on agency forms. As a result, SSA is updating the Privacy Act Statement on the form.

• **Change 27:** On Page 8, in the first bullet on the left hand column, we revised the language to insert a comma as follows:

From:

(To avoid delay in receipt of checks you should ALSO file a regular change of address notice with your post office.)

To:

(To avoid delay in receipt of checks, you should ALSO file a regular change of address notice with your post office.)

Justification 27: The change ensures correct grammar.

• **Change 28:** On Page 8, under the section of the reporting responsibilities entitled "HOW TO REPORT," we revised the language in the first bullet point as follows:

From:

Visiting the section "What You Can Do Online" at our web site at www.socialsecurity.gov;

To:

Visiting the section "Online Services" at our web site at www.socialsecurity.gov;

<u>Justification 28:</u> The language, "What You Can Do Online," is no longer used on the <u>www.socialsecurity.gov</u> homepage. The Office of Communications changed the look on the Social Security Administration's website, and the link now reads, "Online Services."

• **Change 29:** On Page 8, we revised the heading, "FIGURING YOUR ANNUAL EARNINGS," to read as follows:

From:

FIGURING YOUR ANNUAL EARNINGS

To:

FIGURING YOUR YEARLY EARNINGS

Justification 29: The text below the heading refers consistently to "yearly" rather than "annual" earnings. This change ensures consistency in the use of language.

• **Change 30:** On Page 8, in the section on figuring your yearly earnings, we revised the language as follows:

From:

This includes earning both before and after your retirement date, and applies to all earned income whether or not covered by Social Security.

To:

This includes earnings both before and after your retirement date, and applies to all earned income whether or not covered by Social Security.

Justification 30: The current word "earning" should be plural, "earnings."

• Change 31: On Page 8, in the section titled "PLEASE READ THE FOLLOWING INFORMATION CAREFULLY BEFORE ANSWERING QUESTION 28," we revised the language as follows:

From:

(For the appropriate exempt amount, see "How Work Affects Your Benefits.")

To:

(For the appropriate exempt amount, see "How Work Affects Your Benefits" (*Publication No. 05-10069*).)

<u>Justification 31:</u> The current language does not provide indication to the claimant that "How Work Affects Your Benefits" is an SSA publication.

• Change 32: On Page 8, in the section titled "PLEASE READ THE FOLLOWING INFORMATION CAREFULLY BEFORE ANSWERING QUESTION 28," we revised the language as follows:

From:

Thus, your benefit amount at full retirement age will be reduced only you receive one or more full benefit payments prior to the month you attain full retirement age.

To:

Thus, your benefit amount at full retirement age will be reduced only if you receive one or more full benefit payments prior to the month you attain full retirement age.

Justification 32: The word "if" was missing from the sentence between the words "only" and "you."

Revisions to Form SSA-10-INST

• **Change 1:** On Page 1, in the first bullet on the left hand column, we revised the language to insert a comma as follows:

From:

(To avoid delay in receipt of checks you should ALSO file a regular change of address notice with your post office.)

To:

(To avoid delay in receipt of checks, you should ALSO file a regular change of address notice with your post office.)

Justification 1: The change ensures correct grammar.

• **Change 2:** On Page 1, under the section of the reporting responsibilities entitled "HOW TO REPORT," we revised the language in the first bullet point as follows:

From:

Visiting the section "What You Can Do Online" at our web site at www.socialsecurity.gov;

To:

Visiting the section "Online Services" at our web site at www.socialsecurity.gov;

<u>Justification 2:</u> The language, "What You Can Do Online," is no longer used on the <u>www.socialsecurity.gov</u> homepage. The Office of Communications changed the look on the Social Security Administration's website, and the link now reads, "Online Services."

• **Change 3:** We are revising the Privacy Act Statement on this form.

<u>Justification 3:</u> SSA's Office of the General Counsel is conducting a systematic review of SSA's Privacy Act Statements on agency forms. As a result, SSA is updating the Privacy Act Statement on the form.

Revisions to the Collection Instruments – SSA-10-BK PCS Screens:

Background:

The Social Security Administration (SSA) administers benefits under Title II (Retirement, Survivors and Disability), Title XVI (Supplemental Security Income) and Title XVIII (Medicare Part A) which an individual may be eligible to receive concurrently or consecutively. Filing for one benefit may require or restrict the filing of another benefit under the same or different title. When an individual requests to file for one benefit, the SSA employee (technician) must identify other benefits for which the individual may be eligible so the individual can make an informed filing decision.

Prior to taking a Title II, Title XVI or Title XVIII application, technicians may ask a series of questions to determine the benefit type(s) (i.e. Retirement, Disability, Widow, etc.); systems (Title II or Title XVI claims system); claim type (i.e. abbreviated, deferred, or full), and may request Social Security Numbers (SSN) for taking a claim. We refer to the discussion the technician has with an individual before filing a claim as a pre-claim interview. In most cases, the technicians write down the information they collect, and use various SSA systems to determine eligibility and benefit amounts. Since the questions they asked are part of our OMB-approved forms, we already account for them under their associated OMB Control Numbers.

In response to the IT Modernization initiative, SSA is creating the Preliminary Claims System (PCS) for technicians to use when conducting a pre-claim interview. The PCS includes questions that:

- Generate alerts if the pre-claim interview is an exclusion for using PCS (Screen package pages 6-7, 9-11 and 13);
- Identify all Title II potential entitlements (Screen package page 68);
- Calculate benefit amounts for Title II potential entitlements (Screen package, page 68);
- Obtain intent to file for SSI when applicable (Screen package, pages 63 and 67), and
- Assist technicians in determining the type of SSI claim to obtain (i.e. abbreviated, deferred, or full) (Screen package pages 64-66).

The majority of the PCS questions are static with some that have follow-up questions based on the individual's response. At the end of the interview, the technician prints a summary of potential Title II entitlements; benefit amounts; and other filing considerations to review with the individual, and annotates the PCS with the filing decision (i.e. File now, Does not want to file, Set up Appointment or Issue Closeout). (We show this screen in our PCS screen package – pages 69-70.)

Based on the filing decision, the PCS provides instructions or links for accessing the Title II and

Title XVI claims systems to take a claim, or the 800 Number System for scheduling an appointment or issuing a closeout notice when applicable. (We show this in our PCS screen package – pages 71-74.)

Most of the questions mirror Title II or Title XVI application questions (see PCS questions document). Data collected in PCS will propagate into the appropriate claims system if the individual decides to file. If the individual elects not to file, we temporarily store the information collected in PCS's database pursuant to the National Archives and Records Administration approved temporary retention schedules, as described in the September 12, 2018 reviewed agency Records Management Questionnaire for the IT Mod – Title II Initial Claims Process. SSA will also use the information we collect and store in PCS for Management Information purposes.

Upon OMB's approval, SSA will release a limited version of the PCS in March 2019 that will provide individuals potential entitlement to Title II benefits only on their own SSNs. In this initial release, we will limit the respondents for the PCS to first party adults or legally incompetent adults with a legal guardian who:

- Are age 61 and 8 months or allege being disabled;
- Have an SSN;
- Do not have an existing record for SSA entitlement (i.e. Title II, Title XVI, Medicare);
- Do not have an existing SSA claim (i.e. MCS, MSSICS, iClaim); and
- Are not minor children, or adults applying or inquiring on behalf of a minor child.

The March release will go to only eight field offices (VA, CT, MN, OH, CA, DE, DC, and IL) to identify potential defects. We are using the Agile method for creating the PCS and will continue with incremental quarterly releases to enhance PCS's functionality and respondents (see our Future Plans section below). We plan to release the PCS nationally by the fourth quarter of FY2019.

We do not expect the public reporting burden to change when using the PCS in conjunction with taking a claim.

Revisions to Form SSA-10-BK (PCS Screens):

- **Change #1**: Upon OMB's approval, the Preliminary Claims System (PCS) will serve as another modality for collecting some of the Widow's or Widower's Insurance Benefit questions, effective March 2019.
 - <u>Justification #1</u>: Using the PCS as another modality for collecting application questions prevents redundancy in asking respondents' questions that are common to our Widow's or Widower's Insurance Benefit application and the pre-claim interview.
- <u>Change #2</u>: We will require technicians to use PCS to identify Title II potential entitlements prior to taking a Widow's or Widower's Insurance Benefit claim.

<u>Justification #2</u>: Adding PCS to the Widow's or Widower's Insurance Benefit claims process will ensure the technicians identify all Title II benefit(s), including Widow's or Widower's benefits on multiple earnings records to prevent missed entitlements.

• <u>Change #3</u>: We are increasing the developmental costs for this collection by \$1,845,455 to account for the creation and implementation of the PCS for the Widow or Widower's Insurance Benefit application.

<u>Justification #3</u>: The overall estimated developmental cost for creating the PCS is \$20.3 million. This estimate provides for the multi-year effort, and accounts for the database and computational services work, as well as the overhead costs, based on what we know today. Since the PCS serves as a collection tool for eight Title II applications; two Title XVI applications; and iClaim, we are applying portions of the total developmental cost among the eleven applications.

• **Change #4:** The Office of Privacy and Discloser created a new Privacy Act Statement for technicians to use when conducting a pre-claim interview with the PCS.

Justification #4: SSA's Office of the General Counsel is conducting a systematic review of SSA's Privacy Act Statements on agency forms. As a result, SSA is updating the Privacy Act Statement on the form.

We will implement these revisions upon OMB's approval for this information collection request. We do not expect any of these revisions to affect the current reporting burden.

Future Revisions to the Collection Instrument

We intend to enhance PCS's functionality so that it will identify an individual's potential entitlement for Widow or Widower's benefits, and calculate payment amounts with the June 2019 release. As we will use the Agile method for these revisions, we will submit subsequent Change Requests to show our revisions once the PCS screens are available.