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

A.   Justification

1.   **Introduction/Authoring Laws and Regulations**
Sections *202(e)* and *202(f)* of the *Social Security Act (Act)* set forth the
requirements for entitlement to widow(er)'s benefits, including the requirement to
file an application. In addition, *20 CFR 404.335-404.338* of the *Code of Federal
Regulations (Code)* state the policies for implementing the requirements from
sections *202(e)* and *202(f)* of the *Act,* including the requirement to apply for
benefits. To become entitled to benefits, *20 CFR 404.603* of the *Code* requires a
claimant to file an application. Therefore, the Social Security Administration
(SSA) designated Form SSA-10-BK to meet the application requirement.

2.   **Description of Collection**
SSA needs information to make a formal determination for entitlement to
widow(er)'s benefits. We use Form SSA-10-BK to determine whether an
applicant meets the statutory and regulatory conditions for entitlement to
widow(er)'s Title II benefits. SSA employees interview individuals applying for
benefits either face-to-face or via telephone, and enter the information on the
paper form, or into the Modernized Claims System (MCS) and the Preliminary
Claims System (PCS). The respondents are applicants for Widow(er)'s Insurance
Benefits.

3.   **Use of Information Technology to Collect the Information**
In accordance with the agency's Government Paperwork Elimination Act plan,
SSA created and uses MCS and the PCS screens to document information we
obtain from individuals. In addition, we made the form available on our website
as a print-only PDF. Based on our data, we estimate that over 99% of
respondents under this OMB number use the electronic version.

4.   **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.

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 we did not use Form SSA-10-BK, the public would have no way to apply for
Widow(er)'s Insurance Benefits, causing a violation of regulations at *20 CFR
404.335-404.338*, and *404.603*. Because we only collect the information once, we

cannot collect it less frequently. There are no technical or legal obstacles to 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 December 6, 2018, at 83 FR 62943, and we received no public comments. The 30-day FRN published on February 15, 2019 at 84 FR 4597. If we receive any comments in response to this Notice, we will forward them to OMB.

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**

Modality of Completion	Number of Responses	Frequency of Response	Average Burden Per Response (minutes)	Estimated Total Annual Burden (hours)
SSA-10-BK MCS and PCS versions	518,784	1	14	121,050
SSA-10-BK Paper version	2,255	1	15	564
Totals	**521,039**			**121,614**

The total burden for this ICR is **121,614** hours. We based these figures on current management information data. 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 on the respondents.

14. **Annual Cost To Federal Government**
The annual cost to the Federal Government is approximately $4,669,332. This estimate accounts for costs from the following areas: (1) designing, printing, and distributing the form; (2) SSA employee (e.g., field office, 800 number, DDS staff) information collection and processing time; and (3) systems development, updating, and maintenance costs.

15. **Program Changes or Adjustments to the Information Collection Request**
When we last cleared this IC in 2016, the burden was 106,330 hours. However, we are currently reporting a burden of 121,614 hours. This change stems from an increase in responses for the MCS version from 453,509 to 518,784, and an increase in responses for the paper version from 2,045 to 2,255. There is no change to the burden time per response. Although the number of responses changed, SSA did not take any actions to cause this change.

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.