

Justification for Non-Substantive Changes for Form SSA-4-BK
Application for Child's Insurance Benefits
20 CFR 404.350-404.354, CFR 404.602
OMB No. 0960-0010

Justification for Non-Substantive Changes for the SSA-4-BK

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 the Collection Instrument – SSA-4-BK:

- **Change #1:** Upon OMB's approval, the Preliminary Claims System (PCS) will serve as another modality for collecting some of the application questions for the SSA-4-BK, Application for Child Insurance Benefits, effective March 2019.

Justification #1: Using the PCS as another modality for collecting application questions prevents redundancy in asking respondents' questions that are common to the Application for Child Insurance Benefits and the pre-claim interview.

- **Change #2:** 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 Application for Child Insurance Benefits.

Justification #2: 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 #3:** The Office of Privacy and Disclosure created a new Privacy Act Statement for technicians to use when conducting a pre-claim interview with the PCS.
- **Justification #3:** 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.

Future Changes:

We intend to enhance PCS's functionality so that it will identify an individual's potential entitlement to Child Insurance 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.