

**Supporting Statement for Form SSA-704**  
**Certification of Contents of Document(s) or Record(s)**  
**20 CFR 404.707, 404.715, 404.716, 404.720, 404.721,**  
**404.723, 404.725, 404.727, 404.728, 404.730, 404.731, 404.732,**  
**404.733, 404.735, 404.1370, 404.1371, 408.202, 408.216, 416.801,**  
**416.802, 416.804, 416.1816 and 416.1821**  
**OMB No. 0960-0689**

**A. Justification**

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

Sections 205(a), 806(a)-(b), 1631(e)(1)(A)-(B), and 1631(f) of the *Social Security Act (Act)* give the Commissioner of the Social Security Administration (SSA) the authority to establish procedures for individuals providing evidence to establish their rights to Social Security benefits, including Title VIII, Special Veteran's Benefits, and Supplemental Security Income (SSI) payments. Examples of such evidence categories include evidence of age, relationship, citizenship, marriage, death, and military service. *Title 20 of the Code of Federal Regulations (CFR)*, Sections 404.707, 404.715, 404.716, 404.720, 404.721, 404.723, 404.725, 404.727, 404.728, 404.730, 404.731, 404.732, 404.733, 404.735, 404.1370, 404.1371, 408.202, 408.216, 416.801, 416.802, 416.804, 416.1816 and 416.1821 describe the information needed to establish age, citizenship, marriage, death, and military service. SSA accepts State record custodians and other custodians of evidentiary documents to certify and record information from original documents, and records under their custodial ownership, to establish the types of evidence SSA uses in determining an applicant's eligibility for benefits and SSI payments. 20 CFR 404.707 permits the documentation of evidence from certified copies of original records.

**2. Description of Collection**

When individuals applying for Social Security benefits or SSI payments cannot provide documentation to substantiate their information, SSA uses the information on Form SSA-704 to establish proof of age, relationship, citizenship, marriage, death, military service, or to evaluate a family bible or other family record. SSA sends Form SSA-704 to State record custodians and other custodians of evidentiary documents, and, at our request, the custodians complete the form, supplying and verifying an applicant's information against the original documents or records under their purview. We use this form in situations where the applicant cannot produce the evidentiary documentation required to establish eligibility. The respondents are State record custodians and other custodians of evidentiary documents.

**3. Use of Information Technology to Collect Information**

SSA did not create a fillable PDF of this form. In addition, we do not make this form available on our website, as we pre-fill the top portion of the form prior to sending it to respondents. In addition, because we pre-fill information, and due to

the low volume of respondents for these forms, this form is not a good candidate for electronic implementation.

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**

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

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

If SSA did not use Form SSA-704, we would be unable to establish an individual’s eligibility to, or correct payment amount of, Social Security benefits or SSI payments. Because we only collect the information on an as needed basis, 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 collect this information 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 May 2, 2019, at 84 FR 18913, and we received no public comments. The 30-day FRN published on July 18, 2019 at 84 FR 34469. If we receive any comments in response to this Notice, we will forward them to OMB.

9. **Payment or Gift to Respondents**

SSA provides no payment or gifts to the respondents.

10. **Assurances of Confidentiality**

SSA protects and holds confidential the information we collect 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**

<b>Modality of Completion</b>	<b>Number of Respondents</b>	<b>Frequency of Response</b>	<b>Average Burden Per Response (minutes)</b>	<b>Estimated Total Annual Burden (hours)</b>
SSA-704	293	1	10	49

The total burden for this ICR is **49** 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 Respondents**

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

14. **Annual Cost to the Federal Government**

The annual cost to the Federal Government is approximately \$1,012.00. 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.

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

When we last cleared this IC in 2016, the burden was 29 hours. However, we are currently reporting a burden of 49 hours. This change stems an increase in the number of responses from 176 to 293. 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 requirements 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. **Exception 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 did not use statistical methods for this information collection.