

**Supporting Statement for Form SSA-4-BK**  
**Application for Child's Insurance Benefits**  
**20 CFR 404-350 - 404.368 and 404.603, CFR 416.350**  
**OMB No. 0960-0010**

**A. Justification**

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

Title II of the *Social Security Act (Act)* provides for the payment of monthly benefits to the children of an insured, retired, disabled, or deceased worker. Section 202(d) of the *Act* contains the conditions and requirements the applicant must meet when filing an application. 20 CFR 404.350 - 404.368 and 20 CFR 404.603 of the *Code of Federal Regulations (Code)* set forth the eligibility criteria for child's benefits, and require the filing of an application so the Social Security Administration (SSA) can make a determination on the applicant's eligibility for such benefits. For SSA to make such a determination, it is necessary for us to elicit from the applicant information such as date and place of birth, relationship, residence, etc. Section 20 CFR 416.350 of the *Code*, requires SSA to discuss the Supplemental Security Income (SSI) program with every Title II applicant who is within two months of age 65 or older, or might qualify as a blind or disabled person, and give the person a chance to file an application. If the individual does not file an SSI application when we discuss SSI, the filing of the Title II application is an oral inquiry for SSI. The question on the Title II application that asks if the individual wants to file for SSI serves as documentation of the claimant's intent. It also eliminates the need for manually documenting the claimant's intent to file in the remarks portion of the application.

**2. Description of Collection**

SSA uses the information on Form SSA-4-BK to determine entitlement for children of living and deceased workers to monthly Social Security payments. Respondents can complete Form SSA-4-BK and mail it back to SSA, or an SSA employee can interview respondents and enter information into our Modernized Claims Systems (MCS). Prior to filing an application for child's benefits, technicians may conduct a pre-claim interview to identify eligibility to all Title II benefits or SSI and provide applicants with their filing options. In response to the IT Modernization initiative, SSA created the Preliminary Claims System (PCS) for technicians to use when conducting a pre-claim interview. SSA will use the information collected in PCS to identify eligibility to all Title II benefits and SSI. Respondents are guardians completing the form on behalf of the children of living or deceased workers, or the children of living or deceased workers.

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

In accordance with the agency's Government Paperwork Elimination Act plan, SSA created an electronic version of Form SSA-4-BK. Based on our data, we estimate approximately 95% 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 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 we did not use Form SSA-4-BK, we would not be able to entitle children of living and deceased workers to monthly Social Security payments. 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.
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 July 3, 2019, at 84 FR 31972, and we received no public comments. The 30-day FRN published on September 16, 2019 at 48694. 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**

<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>	<b>Average Theoretical Hourly Cost Amount (dollars)*</b>	<b>Total Annual Opportunity Cost (dollars)**</b>
Application for Child's Insurance	1,204	1	12	241	\$22.50*	\$27,090**

Benefits / Death Claim / Paper SSA-4-BK						
Application for Child's Insurance Benefits / Death Claim / Modernized Claims System (MCS) and Preliminary Claims System (PCS)	204,777	1	11	37,542	\$22.50*	\$4,607,482**
Application for Child's Insurance Benefits / Life Claim / Paper SSA-4-BK	3,484	1	12	697	\$22.50*	\$78,390**
Application for Child's Insurance Benefits / Life Claim / MCS and PCS	422,267	1	11	77,416	\$22.50*	\$9,501,007**
<b>Totals</b>	<b>631,732</b>			<b>115,896</b>		<b>\$14,213,969**</b>

\* We based this figure on average U.S. citizen's hourly salary, as reported by Bureau of Labor Statistics data.

\*\* This figure does not represent actual costs that SSA is imposing on recipients of Social Security payments to complete this application; rather, these are theoretical opportunity costs for the additional time respondents will spend to complete the application. **There is no actual charge to respondents to complete the application.**

The total burden for this ICR is **115,896** burden hours (reflecting SSA management information data), which results in an associated theoretical (not

actual) opportunity cost financial burden of **\$14,213,969**. SSA does not charge respondents to complete our applications.

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 \$4,278,781. 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 ICR in 2016, the burden was 125,034 hours. However, we are currently reporting a burden of 115,896 hours. This change stems a decrease in the number of responses from 125,034 to 115,896. 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.

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.