

**Supporting Statement for Form SSA-721  
Statement of Death by Funeral Director  
20 CFR 404.715 and 404.720  
OMB No. 0960-0142**

**A. Justification**

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

Section 202(d) of the *Social Security Act (Act)* and Section 20 *CFR 404.715* of the *Code of Federal Regulations* mandate that the Social Security Administration (SSA) provide death benefit payments to the appropriate surviving family member when an SSA-insured worker dies. Before making these payments, SSA must obtain evidence of the insured individual's death. SSA considers a funeral director's statement to be a preferred type of such evidence (as per 20 *CFR 404.720*). SSA uses Form SSA-721, Statement of Death by Funeral Director, to obtain a funeral director's confirmation of death for an SSA-covered individual.

**2. Description of Collection**

When an SSA-insured worker dies, the funeral director or funeral home responsible for the worker's burial or cremation completes Form SSA-721 and sends it to SSA. SSA uses this information for three purposes: (1) to establish proof of death for the insured worker; (2) to determine if the insured individual was receiving any pre-death benefits SSA needs to terminate; and (3) to ascertain which surviving family member is eligible for the lump-sum death payment or for other death benefits. The respondents are funeral directors who handled death arrangements for the insured individuals.

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

The SSA-721 form is available as a printable, fillable PDF on our website. However, funeral directors can also use SSA's Internet-based collection instrument, the Electronic Death Registration Process (EDR) (OMB No. 0960-0700), to electronically submit similar information to SSA. We do not account for the EDR submissions under this information collection request, as we account for them under 0960-0700.

This collection does not currently have a fully public-facing Internet version, as we prioritized other information collections for full electronic conversions, and we already have a way for respondents to submit similar information through the Internet (EDR, as mentioned above). As per our 4/3/20 conversation with OIRA, we welcome OIRA to join our conversations with OMB on IT Mods; however, as our IT Mod programming is an ongoing project, we cannot provide timelines for when we will be able to make any particular ICR available via the Internet. We will convert existing ICRs to full electronic versions depending on how they fall within our overall IT Mod schema, but this is unconnected to the PRA approval lifecycle.

4. **Why We Cannot Use Duplicate Information**

SSA does not use any other paper collection instrument to collect similar data to the data we are collecting here; however, we also offer an electronic version under OMB No. 0960-0700, which collects similar data. The respondent only needs to complete and send this information once, using the paper SSA-721 (0960-0142), or the EDR (0960-0700).

5. **Minimizing Burden on Small Respondents**

This information collection does not significantly affect small businesses or other small entities. SSA attempts to reduce the burden of this collection by providing funeral homes with a relatively short, standardized form for reporting deaths. In addition, SSA employees collect this information only once from the respondent to avoid undue burden on the funeral homes and directors.

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

If we did not use Form SSA-721, we would lose a valuable source confirming insured individuals' deaths, which would affect the issuance of death benefits and the termination of other benefits the individual received prior to death. 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 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 29, 2020, at 85 FR 45723, and we received no public comments. The 30-day FRN published on October 8, 2020 at 85 FR 63630. If we receive any comments in response to this Notice, we will forward them to OMB. We did not consult with the public in the maintenance of this collection. We did not consult with the public in the revision of this form.

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>
<b>SSA-721</b>	<b>544,233</b>	<b>1</b>	<b>4</b>	<b>36,282</b>	<b>\$28.04*</b>	<b>\$1,017,347**</b>

\* We based this figure on average funeral service worker’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 **36,282 hours** (reflecting SSA management information data), which results in an associated theoretical (not actual) opportunity cost financial burden of **\$1,017,347**. SSA does not charge respondents to complete our applications. 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 **\$47,609,731**. This estimate accounts for costs from the following areas:

<b>Description of Cost Factor</b>	<b>Methodology for Estimating Cost</b>	<b>Cost in Dollars*</b>
Designing and Printing the Form	Design Cost + Printing Cost	\$680
Distributing, Shipping, and Material Costs for the Form	Distribution + Shipping + Material Cost	\$1,460.00
SSA Employee (e.g., field office, 800 number, DDS staff) Information Collection and Processing Time	GS-9 employee x # of responses x processing time	\$47,587,733
Full-Time Equivalent Costs	Out of pocket costs + Other expenses for providing this service	\$0
Systems Development, Updating, and Maintenance	GS-9 employee x man hours for development, updating,	\$19,858

	maintenance	
Quantifiable IT Costs	Any additional IT costs	\$0
<b>Total</b>		<b>\$47,609,731</b>

\* We have inserted a \$0 amount for cost factors that do not apply to this collection.

SSA is unable to break down the costs to the Federal government further than we already have. First, since we work with almost every US citizen, we often do bulk mailings, and cannot track the cost for a single mailing. Because so many employees have a hand in each aspect of our forms, we use an estimated average hourly wage, based on the wage of our average field office employee (GS-9) for these calculations. However, we have calculated these costs as accurately as possible based on the information we collect for creating, updating, and maintaining these information collections.

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

When we last cleared this IC in 2017, the burden was 46,909 hours. However, we are currently reporting a burden of 36,282 hours. This change stems from a decrease in the number of responses from 703,638 to 544,233. 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. These figures represent current Management Information data.

**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.