

**Supporting Statement for Social Security Benefits Applications:
Form SSA-1: Application for Retirement Insurance Benefits
Form SSA-2: Application for Wife's or Husband's Insurance Benefits
Form SSA-16: Application for Disability Insurance Benefits
20 CFR 404.310-404.311, 404.315-404.322, 404.330-404.333, 404.601-404.603, and
404.1501-404.1512
OMB No. 0960-0618**

A. Justification

1. Introduction/Authoring Laws and Regulations

The Social Security Administration (SSA) provides Retirement, Wife's or Husband's, and Disability Insurance benefits to members of the public who meet the required eligibility criteria and file the correct application. Sections 202(a)-(c), Sections 205(a)(i), and 223 (a) of the *Social Security Act (Act)*, and Sections 20 CFR 404.310-404.311, 404.315-404.322, 404.330-404.333, 404.601-404.603, and 404.1501-404.1512 of the *Code of Federal Regulations* explain entitlement criteria for each benefit and application requirements.

For qualifying beneficiaries, an application for Title II cash payments is also an application for Title XVIII Hospital Insurance (HI) (as per Section 226 of the *Act*), and by extension automatic enrollment in Supplemental Medical Insurance (SMI) as well (Sections 1831 and 1836 of the *Act*).

2. Description of Collection

SSA uses the information gathered by each benefit application to determine eligibility for Social Security benefits and the amount of the benefits. Collection of this information is mandatory for SSA to award or deny retirement, wife's or husband's, and disability benefits. The public can apply for the appropriate benefit type using one of three modalities: 1) a paper application (form SSA-1, SSA-2, or SSA-16); 2) a field office interview, during which SSA employees enter applicant data directly into the Modernized Claims System (MCS); or 3) using an online system (iClaim). Third-party representatives of applicants can use any of these modalities to apply for the applicants they represent. The following is a list and description of each modality SSA uses to collect information for these benefit applications.

Paper Application Forms:

SSA-1 – Application for Retirement Insurance Benefits: SSA uses Form SSA-1 to determine individuals' entitlement to retirement insurance benefits.

SSA-2 – Application for Wife's or Husband's Insurance Benefits: SSA uses Form SSA-2 to determine individuals' entitlement to spouses' or divorced spouses' insurance benefits.

SSA-16 – Application for Disability Insurance Benefits: SSA uses Form SSA-16 to determine individuals' entitlement to Disability Insurance benefits under Title II of the Act.

SSA no longer prints and delivers paper copies of these forms to field offices since printable and fillable versions are available on our website.

Interview/MCS Screens:

MCS mirrors the retirement, wife's and husband's, and disability paper application formats using an electronic collection method. Guided by the MCS collection screens, an SSA representative interviews the applicant either by phone or in person and inputs the information directly into SSA's application database. MCS prompts the representative with the required questions based on the type of application the applicant files, and the applicant's initial responses. MCS also propagates information to other screens in the application. MCS prints an application summary for the claimant to review and sign by either attestation or wet signature. In contrast to the paper application, the interview/MCS process offers the following advantages: 1) it improves accuracy in recording responses, 2) it reduces the overall interview time, and 3) it reduces the number of times we have to re-contact applicants to clarify responses.

Internet Claim (iClaim) Application:

iClaim is an online platform that mirrors the MCS format. The public can use iClaim to apply for retirement, wife or husband, and disability insurance benefits. Depending on their initial answers, iClaim presents applicants with different screens, ensuring they only respond to relevant questions. iClaim also provides the option to use the retirement application as an application for wife's or husband's benefits. After completing the online application, claimants or their third-party respondents can submit it electronically to SSA, avoiding the need to visit an SSA office. **Third-party iClaim respondents** are individuals who complete and submit an online claim for a claimant. A third-party iClaim respondent cannot electronically sign the online application for the claimant. iClaim is more convenient for users and reduces their application completion time by eliminating the need for an office visit. This also saves time and resources for SSA.

There are two ways to complete and submit an application via iClaim. **First-party iClaim respondents** are individuals (claimants) who complete, electronically sign, and submit the entire application online on their own behalf. They may have to submit supplementary supporting documents (e.g., medical evidence for disability benefits applications) to finalize the application. After a third-party respondent submits an online claim, SSA sends an application summary directly to the claimant. The claimant must review, correct and initial if necessary, and sign the application summary confirming the information and their intent to file for benefits and submit it to SSA. Once SSA receives the application summary, and any supplemental information if necessary, we process the application.

3. Use of Information Technology to Collect the Information

SSA offers electronic versions of this information collection (specifically, MCS and iClaim) under the agency's Government Paperwork Elimination Act plan. Approximately 94% of respondents submit their applications via electronic methods.

4. Why We Cannot Use Duplicate Information

The information we collect with each of these applications is also collected with other Title II, Title XVI and Title XVIII applications as well as when scheduling an appointment with eLAS or iAppointment. We are able to reduce the collection of redundant information by storing person-centric data (i.e., date of birth, marriage data, contact information) when first collected by SSA. When using a system application such as MCS, any person-centric data previously collected will propagate into the claims path for the technician to verify and update when necessary.

5. Minimizing Burden on Small Respondents

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

6. Consequence of Not Collecting Information or Collecting It Less Frequently

If SSA did not collect this information, the public would have no way to apply for Social Security benefits, which would be a direct violation of regulations *20 CFR 404.310-404.311, 404.315-404.322, 404.330-404.333, 404.601-404.603, and 404.1501-404.1512*. 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 was published on December 30, 2020, at 85 FR 86638, and we received no public comments. The 30-day FRN was published on March 12, 2021, at 86 FR 14170.

Correction Notice: The first Federal Register Notice shows incorrect burden information for this collection. We have corrected for this in the second Notice, in #12 below and on ROCIS.

If we receive any comments in response to this Notice, we will forward them to OMB.

9. Payment or Gifts to Respondents

SSA provides no payments or gifts to the respondents.

10. Assurances of Confidentiality

SSA protects and holds confidential the information we are requesting 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. Additionally, SSA protects and holds confidential the information it receives by adhering to our Internet Privacy Policy, which stipulates:

- The public does not need to give us personal information to visit our site;
- We collect personally identifiable information (name, SSN, DOB or e-mail) only if we know beneficiaries or their representatives provided it;
- We use personally identifying information to administer our programs and to provide certain online services;
- We use web measurement and customization technologies to measure and analyze how our site is used and to customize user experience. We also use third-party vendors in our measurement and customization process;
- We may share personal information with our employees and contractors, who have a need to know the information within their job duties, and outside the agency, as authorized by Federal law..

We also take the following measures to ensure the confidentiality of applicants' personal information:

- We give applicants adequate warnings that the Internet is an open system, and there is no absolute guarantee others will not intercept and decrypt the personal information the applicants submitted. We advise applicants about alternative methods of providing personal information, i.e., a personal visit to a field office or a call to the 800 number;
- We will only allow requestors access to additional screens used for making changes to personal information or requests to SSA once we verify requestor identity.

11. Justification for Sensitive Questions

The information collection does not contain any questions of a sensitive nature.

12. Estimates of Public Reporting Burden

Below we provide annual burden estimates for the multiple components of this information collection:

SSA-1

Modality of Completion	Number of Respondents	Frequency of Response	Average Burden Per Response (minutes)	Estimated Annual Burden (hours)	Average Theoretical Cost Amount (dollars)*	Average Wait Time in Field Office (minutes)*	Total Annual Opportunity Cost (dollars)***
Paper version/SSA-1	2,346	1	11	430	\$25.72*	24**	\$35,185***
Interview/MCS	1,925,180	1	10	320,863	\$25.72*	24**	\$28,058,842***
Internet/iClaim -Domestic Residence:							
First Party	1,470,043	1	15	367,511	\$25.72*		\$9,452,383***
Third party initiated (complete and submit)	25,706	1	15	6,427	\$25.72*		\$165,302***
Internet/iClaim -Foreign Residence:							
First Party	7,993	1	18	2,398	\$25.72*		\$61,677***
Third party-initiated (complete and submit)	645	1	18	194	\$25.72*		\$4,990***
Totals	3,431,913			697,823			\$37,778,379***

SSA-2

Modality of Completion	Number of Respondents	Frequency of Response	Average Burden Per Response (minutes)	Estimated Annual Burden (hours)	Average Theoretical Cost Amount (dollars)*	Average Wait Time in Field Office (minutes)*	Total Annual Opportunity Cost (dollars)***
Paper version/SSA-2	779	1	15	195	\$25.72*	24**	\$13,040***
Interview/MCS	407,415	1	14	95,064	\$25.72*	24**	\$6,636,532***

iClaim	124,499	1	15	31,125	\$25.72*		\$800,535****
Totals	532,693			126,384			\$7,450,107****

SSA-16

Modality of Completion	Number of Respondents	Frequency of Response	Average Burden Per Response (minutes)	Estimated Annual Burden (hours)	Average Theoretical Cost Amount (dollars)*	Average Wait Time in Field Office (minutes)*	Total Annual Opportunity Cost (dollars)****
Paper version/SSA-16	29,485	1	20	9,828	\$25.72*	24**	\$556,118****
Interview/MCS	920,938	1	19	291,630	\$25.72*	24**	\$16,975,329****
Internet/iClaim -Domestic Residence:							
First Party	503,567	1	15	125,892	\$25.72*		\$3,237,942****
Third party initiated (complete and submit)	528,474	1	15	132,119	\$25.72*		\$3,398,101****
Internet/iClaim -Foreign Residence:							
First Party	781	1	18	234	\$25.72*		\$6,018****
Third party-initiated (complete and submit)	123	1	18	37	\$25.72*		\$952****
Totals	1,983,368			559,740			\$24,174,460****

Grand Total

Modality of Completion	Number of Respondents	Frequency of	Average Burden	Estimated Annual	Average Theoretical	Average Wait Time	Total Annual Opportunity
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		Response	Per Response (minutes)	Burden (hours)	Cost Amount (dollars)*	in Field Office (minutes)*	Cost (dollars) ***
Total	5,947,974			1,383,947			\$69,402,946***

* We based this figure on the average hourly wage for all occupations in May 2019 as reported by the U.S. Bureau of Labor Statistics (https://www.bls.gov/oes/current/oes_nat.htm#00-0000).

** We based this figure on the average FY 2020 wait times for field offices, based on SSA’s current management information 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.**

In addition, OMB’s Office of Information and Regulatory Affairs (OIRA) is requiring SSA to use a rough estimate of a 30-minute, one-way, drive time in our calculations of the time burden for this collection. OIRA based their estimation on a spatial analysis of SSA’s current field office locations and the location of the average population centers based on census tract information, which likely represents a 13.97 mile driving distance for one-way travel. We depict this on the chart below:

Total Number of Respondents Who Visit a Field Office	Frequency of Response	Average One-Way Travel Time to a Field Office (minutes)	Estimated Total Travel Time to a Field Office (hours)	Total Annual Opportunity Cost for Travel Time (dollars)****
3,286,143	1	30	1,643,072	\$42,259,812****

****We based this dollar amount on the Average Theoretical Hourly Cost Amount in dollars shown on the burden chart above.

Per OIRA, we include this travel time burden estimate under the 5 CFR 1320.8(a)(4), which requires us to provide “time, effort, or financial resources expended by persons [for]...transmitting, or otherwise disclosing the information,” as well as 5 CFR 1320.8(b)(3)(iii) which requires us to estimate “the average burden collection...to the extent practicable.” SSA notes that we do not obtain or maintain any data on travel times to a field office, nor do we have any data which shows that the average respondent drives to a field office, rather than using any other mode of transport. SSA also acknowledges that

respondents' mode of travel and, therefore, travel times vary widely dependent on region, mode of travel, and actual proximity to a field office.

NOTE: We included the total opportunity cost estimate from this chart in our calculations when showing the total time and opportunity cost estimates in the paragraph below.

We base our burden estimates on current management information data, which includes data from actual interviews, as well as from years of conducting this information collection. Per our management information data, we believe that 15 minutes accurately shows the average burden per response for reading the instructions, gathering the facts, and answering the questions. Based on our current management information data, the current burden information we provided is accurate. The total burden for this collection instrument is **1,383,947** burden hours (reflecting SSA management information data), which results in an associated theoretical (not actual) opportunity cost financial burden of **\$111,662,758**. SSA does not charge respondents to complete our applications.

13. Annual Cost Burden to the Respondents (Other)

This collection does not impose a known cost burden to the respondents. This is an information collection request that individuals use to apply for benefits and there are no fees or costs associated with the application.

14. Annual Cost To Federal Government

The annual cost to the Federal Government is approximately \$96,004,138. This estimate accounts for costs from the following areas:

Description of Cost Factor	Methodology for Estimating Cost	Cost in Dollars*
Designing and Printing the Form	Design Cost + Printing Cost	\$5,582
Distributing, Shipping, and Material Costs for the Form	Distribution + Shipping + Material Cost	\$1,200
SSA Employee (e.g., field office, 800 number, DDS staff) Information Collection and Processing Time	GS-9 employee x # of responses x processing time	\$95,503,816
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, maintenance	\$493,540
Quantifiable IT Costs	Any additional IT costs	\$0

Total		\$96,004,138
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* 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. In addition, it is difficult for us to break down the cost for processing a single form, as field office and State Disability Determination Services staff often help respondents fill out several forms at once, and the time it takes to do so can vary greatly per respondent. As well, 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 Information Collection in 2017, the burden was 1,576,027 hours. However, we are currently reporting a burden of 1,383,743 hours. This change stems from a decrease in the number of responses from 7,103,513 to 5,947,974. There is a change to the number of responses due to the removal of the Medicare Only Application and the iAppointment System from this package. In addition, we also account for normal fluctuation in usage, and we included the travel time estimate in our calculations for the paper and MCS versions of the information collections. 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

For the paper forms SSA-1, SSA-2, and SSA-16, 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.

SSA is not requesting an exemption to the requirement to display the OMB approval expiration date for MCS or for the Internet (iClaim) application.

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. Collection of Information Employing Statistical Methodologies

This information collection does not use statistical methods.