

Supporting Statement for Form SSA-7-F6
Application for Parent's Insurance Benefits
20 CFR 404.370, 404.371, 404.373, 404.374 and 404.601-404.603
OMB No. 0960-0012

A. Justification

1. Introduction/Authoring Laws and Regulations

Section 202(h) of the *Social Security Act (Act)* provides for the payment of monthly benefits to a surviving parent of a deceased worker when the deceased worker was contributing at least one-half of the parent's support at the time of the worker's death or when the worker became disabled. Sections 20 CFR 404.370, 404.371, 404.373, 404.374 and 404.601-404.603 of the *Code of Federal Regulations* prescribe the eligibility criteria and application instructions for these benefits. Sections 202, 205, 223, 226, and 806 of the *Act*, as amended, allow us to collect this information.

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. This information collection is voluntary. However, the collection of this information is mandatory for SSA to award or deny monthly benefits as parents of a deceased worker. The public can apply for this benefit using one of two modalities: (1) a paper application (Form SSA-7-F6); or (2) a field office interview (in person or by telephone), during which SSA employees enter applicant data directly into the Modernized Claims System (MCS). The respondents are applicants filing for Parent's Insurance Benefits.

3. Use of Information Technology to Collect the Information

This form is available as a print-only, fillable PDF on SSA's website. In addition, SSA created an Intranet version of Form SSA-7-F6, the MCS screens. This collection does not currently have a fully public facing Internet version, as we prioritized other information collections for full electronic conversions. Given that IT Mod programming is an ongoing, dynamic project, we cannot provide specific timelines for when we will be able to make any particular ICR available via Internet web-based application. We will ultimately convert most existing ICRs to full electronic versions depending on how they fall within our overall IT Mod schema, but this may be unconnected to the PRA approval lifecycle.

In the interim, we evaluated this collection for conversion to a submittable PDF. Given the high volume of conversions we are coordinating and the more urgent nature of some of the other conversions, we ultimately decided not to prioritize this ICR for conversion to fully submittable PDF at this time. When we are able to schedule this form for conversion to a submittable PDF, we will submit a Change Request to OMB to request prior approval.

- 4. Why We Cannot Use Duplicate Information**

The information we collect with this application is also collected with other Title II, Title XVI and Title XVIII applications. 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 SSA first collects it. 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, rather than collecting it a new information.
- 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 collect this information, the public would have no way to apply for Parent's Insurance Benefits, which would be a direct violation of regulations *20 CFR 404.370, 404.371, 404.373, 404.374* and *404.601-404.603*. 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 published on July 27, 2021 at 86 FR 40221, and we received no public comments. The 30-day FRN published on September 29, 2021 at 86 FR 54007. 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**

Please see the burden chart below:

Modality of Completion	Number of Respondents	Frequency of Response	Average Burden Per Response (minutes)	Estimated Total Annual Burden (hours)	Average Theoretical Hourly Cost Amount (dollars)*	Average Wait Time in Field Office or for Teleservice Centers (minutes) **	Total Annual Opportunity Cost (dollars)***
SSA-7-F6 (Paper)	4	1	15	1	\$27.07*	0	\$27***
Interview (MCS)	325	1	15	81	\$27.07*	21**	\$5,279***
Totals	329			82			\$5,306***

* We based this figure on the average U.S. worker’s hourly wages, as reported by Bureau of Labor Statistics data (https://www.bls.gov/oes/current/oes_nat.htm#00-0000).

** We based this figure on averaging both the average FY 2021 wait times for field offices and teleservice centers, 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 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)*****
163****	1	30	82	\$2,220*****

**** We based this figure on half of the number of respondents for the Interview (MCS), as respondents both travel into the FO or call over the phone to complete this modality.

***** 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 opportunity cost estimates in the paragraph below.

The total burden for this ICR is **82** burden hours (reflecting SSA management information data), which results in an associated theoretical (not actual) opportunity cost financial burden of **\$7,526**. SSA does not charge respondents to complete our applications. 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 the 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.

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 \$2,770. 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	\$20
Distributing, Shipping, and Material Costs for the Form	Distribution + Shipping + Material Cost	\$0*
SSA Employee (e.g., field office, 800 number, DDS staff) Information Collection and Processing Time	GS-9 employee x # of responses x processing time	\$2,000
Full-Time Equivalent Costs	Out of pocket costs + Other expenses for providing this service	\$0*
Systems Development,	GS-9 employee x man hours for	\$750

Updating, and Maintenance	development, updating, maintenance	
Quantifiable IT Costs	Any additional IT costs	\$0*
Total		\$2,770

* 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. It is difficult for us to break down the cost for processing a single form, as field office 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 IC in 2018, the burden was 42 hours. However, we are currently reporting a burden of 82 hours. This change stems from an increase in the number of respondents from 168 to 329. 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. Program Changes or Adjustments to the Information Collection Request

SSA will not publish the results of the information collection.

17. Plans for Publication Information Collection Results

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. Displaying the OMB Approval Expiration Date

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 Methods

SSA does not use statistical methods for this information collection.