

**Supporting Statement for Form SSA-10**  
**Application for Widow's or Widower's Insurance Benefits**  
**20 CFR 404.335-404.338, and 404.603**  
**OMB No. 0960-0004**

**A. Justification**

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

Sections 202(e) and 202(f) of the *Social Security Act (Act)* set forth the requirements for entitlement to widow's or widower's benefits, including the requirement to file an application. In addition, 20 CFR 404.335-404.338 of the *Code of Federal Regulations (Code)* state the policies for implementing the requirements from Sections 202(e) and 202(f) of the *Act*, including the requirement to apply for benefits. To become entitled to benefits, 20 CFR 404.603 of the *Code* requires a claimant to file an application. Therefore, the Social Security Administration (SSA) designated Form SSA-10 to meet the application requirement.

**2. Description of Collection**

SSA needs information to make a formal determination for entitlement to widow's or widower's benefits. We use Form SSA-10 to determine whether an applicant meets the statutory and regulatory conditions for entitlement to widow's or widower's under the Old Age, Survivors, and Disability Insurance (OASDI) program. SSA employees interview individuals applying for benefits either face-to-face or via telephone and enter the information into the Modernized Claims System (MCS). Per current management information data, we complete a majority of interviews via telephone. When MCS is temporary unavailable, technicians use the paper form to record the information. The respondents are applicants for widow's or widower's benefits.

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

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**  
Some of the information we collect with the SSA-10 is also collected by other Title II, Title XVI and Title XVIII applications for their purpose. We reduce the collection of redundant information by storing person-centric data (i.e., date of birth, citizenship, marriage data, contact information) when first collected by SSA. When using a system application such as MCS, 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 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-10, the respondents would not have a means to apply for widow's or widower's benefits under the OASDI program. 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 March 30, 2022, at 87 FR 18456, and we received no public comments. The 30-day FRN published on June 1, 2022, at 87 FR 33282. 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	Estimated Total Annual Burden	Average Theoretical Hourly Cost	Average Wait Time in Field Office or	Total Annual Opportunity Cost (dollars)***
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			(minutes)	(hours)	Amount (dollars)*	for Teleservice Centers (minutes) **	
SSA-10 (Paper)	2,116	1	30	1,058	\$28.01*		\$29,635***
SSA-10 (MCS)	570,540	1	30	285,270	\$28.01*	21**	\$13,583,702***
<b>Totals</b>	<b>572,656</b>			<b>286,328</b>			<b>\$13,613,337***</b>

\* 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](https://www.bls.gov/oes/current/oes_nat.htm)).

\*\* We based this figure by averaging the average FY 2022 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.**

NOTE: We did not include travel time as per our current management information data, a majority of respondents complete interviews via telephone. Should this change in the future, we will include the language and chart for travel time to a field office.

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 **30** 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 **286,328** burden hours (reflecting SSA management information data), which results in an associated theoretical (not actual) opportunity cost financial burden of **\$13,613,337**. 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 **\$4,662,074**. 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	\$1,745
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	\$4,600,000
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	\$60,329
Quantifiable IT Costs	Any additional IT costs	\$0*
<b>Total</b>		<b>\$4,662,074</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. 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 2019, the burden was 121,614 hours. However, we are currently reporting a burden of 286,328 hours. This change stems from an increase in the number of responses from 521,039 to 572,656. In addition, we updated the completion time from 14 & 15 to 30 minutes. We made the correction to the average burden per response per our current management information data. We believe that 30 minutes is a better estimate for respondents to gather information, read the instructions, and to complete the form.
- 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.