

**Supporting Statement for Form SSA-2010-F6
Statement for Determining Continuing Entitlement for
Special Veterans Benefits (SVB)
OMB No. 0960-0782**

A. Justification

1. Introduction/Authoring Laws and Regulations

Title VIII of the Social Security Act (Act) provides for the payment of Special Veterans benefits (SVB) to certain World War II veterans who reside outside of the United States. SSA has the authority under the *Code of Federal Regulations, 20 CFR 408.714*, to request information from a beneficiary receiving Social Security benefits under the SVB program. Additionally, Sections 808 and 810 of the *Act* allows us to collect this information. We contact the beneficiaries by mail for their benefit review and have them complete Form SSA-2010-F6, Statement for Determining Continuing Entitlement for Special Veterans Benefits. Completion of this form helps us to maintain the integrity of the SVB program to determine continuing entitlement and the correct payment amount.

2. Description of Collection

SSA regularly reviews individuals' claims for SVB to determine their continued eligibility and the correct payment amounts. Individuals living outside of the United States who receive SVB must report to SSA any changes that may affect their benefits. We initiate this collection request by sending yearly notice with instructions (SSA-2010-F6 Cover Letter), which includes an SSA-2010-F6. Since we cannot rely on self-reporting, SSA uses Form SSA-2010-F6 to collect this required information from beneficiaries living outside the United States (U.S.) who are collecting SVB. All SVB beneficiaries have interviews with the Federal Benefits Unit (FBU) every year, who assist them in completing this form. Respondents are SVB beneficiaries living outside the U.S.

3. Use of Information Technology to Collect the Information

Form SSA-2010-F6 is available as a fillable printable PDF on SSA's website. The FBU's assist beneficiaries in completing the form via interviews. The FBU's enter the information from the form into the Consolidated Claims Experience system. We do not plan on making a fully electronic version of this information collection because the FBU's assist with the completion of every form due to the age of the respondents. In addition, because the population who can receive SVB are World War II veterans, the youngest of whom are now in their mid to late 90's, we expect the respondent pool to continue to decrease over the next several years, until there are no longer any respondents who are eligible for SVB.

4. Why We Cannot Use Duplicate Information

The nature of the information we collect and the manner in which we collect it precludes 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-2010-F6, we would have no means to maintain the integrity of the SVB program to determine continuing entitlement and correct payment amounts for the recipients, which could result in improper payments and overpayments. 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 June 30, 2022, at 87 FR 39153, and we received no public comments. The 30-day FRN published on September 20, 2022 at 87 FR 57551. 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 for Teleservice Centers (minutes)**	Total Annual Opportunity Cost (dollars)***
SSA-2010-F6	85	1	20	28	\$28.01*	19**	\$1,541***

* 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).

** We based this figure on the average FY 2022 wait times for 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.**

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 20 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 28 burden hours (reflecting SSA management information data), which results in an associated theoretical (not actual) opportunity cost financial burden of \$1,541. 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 \$4,315. 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	\$55
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	GS-9 employee x # of responses x processing time	\$840

and Processing Time		
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	\$3,420
Quantifiable IT Costs	Any additional IT costs	\$0*
Total		\$4,315

* 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 127 hours. However, we are currently reporting a burden of 28 hours. This change stems from a decrease in the number of responses from 382 to 85. As we mentioned in #3 above, the respondents are World War II veterans, so we expect the respondent pool to continue to decrease over the next several years. 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.

Note: The total burden reflected in ROCIS is **55**, while the burden cited in #12 of the Supporting Statement is **28**. This discrepancy is because the ROCIS burden reflects the following components: teleservice center waiting time. In contrast, the chart in #12 of the Supporting Statement reflects actual burden.

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.