

Supporting Statement for Child-Care Dropout Questionnaire
Form SSA-4162
20 CFR 404.211(e)(4)
OMB No. 0960-0474

A. Justification

1. Introduction/Authoring Laws and Regulations

Section 215(b)(2)(A) of the *Social Security Act* and 20 CFR 404.211(e)(4) of the *Code of Federal Regulations* permit the exclusion of years from the computation period during which individuals were living with their own (or their spouse's) child under age 3, and has zero earnings in the benefit computation years. We refer to this exclusion as the child-care dropout years, and it applies to disability benefit computations.

2. Description of Collection

The basic Social Security disability benefits application form (cleared under OMB No. 0960-0618) contains a lead question asking if the applicant cared for their own or their spouse's children under age 3 and had no earnings during that period. If the answer is yes, an SSA technician follows up with the applicant to complete Form SSA-4162 (either through a personal interview with an SSA claims representative (CR) or using the paper form). SSA uses the information to determine if the applicant qualifies for the child-care exclusion. For the modernized claims system (MCS) application version, the beneficiary provides the information verbally to the SSA claims representative (CR) during a personal interview, and the CR inputs the information directly into the MCS application. The CR prints the MCS application for the beneficiary to verify and sign. If SSA needs the SSA-4162 post-entitlement, the CR informs the individual that the form is needed and advises where to find it on SSA's website. If the individual doesn't have access to SSA's website, we can mail a copy of the form to the individual. Form SSA-4162 provides clear instructions on how to complete it and where to send it. Respondents are applicants for Title II disability benefits.

3. Use of Information Technology to Collect the Information

SSA created a fillable PDF version of this form for respondents to download, complete, print, and submit to SSA. 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 nature of the information we collect and the manner in which we collect it preclude 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 collect the information, we would not be able to determine which years to use in the computation period, and which years to exclude from the computation as childcare dropout years. This would be a violation of regulations at *20 CFR 404.211(e)(4)*. 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 24, 2022, 2009, at 87 FR 37899, and we received no public comments. The 30-day FRN published on August 26, 2022 at 87 FR 52605. 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 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

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 (minutes)**	Total Annual Opportunity Cost (dollars)***
SSA-4162	1,563	1	10	261	\$28.01*	24**	\$24,817***

* 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 by averaging the average FY 2022 wait times for field office wait time, 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)***
1,563	1	30	782	\$21,169

*** 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.

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 5 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 ICR is **261** burden hours (reflecting SSA management information data), which results in an associated theoretical (not actual) opportunity cost financial burden of **\$42,369**. SSA does not charge respondents to complete our applications

13. Annual Cost to the Respondents

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 \$6,577. 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 (we no longer print or ship this form; we host and maintain a PDF (fillable) on SSA's website and account for that cost below in the "Systems Development, Updating, and Maintenance" Cost Factor.	\$281*
Distributing, Shipping, and Material Costs for the Form	Distribution + Shipping + Material Cost (we no longer distribute or ship this form)	\$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	\$2,876
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		\$6,577

* 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 IC in 2019, the burden was 167 hours. However, we are currently reporting a burden of 261 hours. This change stems a decrease in the number of responses from 2,000 to 1,563. In addition, we updated our burden per response from 5 minutes to 10 minutes based on current Management Information data, and our reassessment of the burden to ensure we allow time for reading the instructions, gathering the data, and answering the questions. These figures represent current Management Information data.

***Note:** The total burden reflected in ROCIS is **1,407**, while the burden cited in #12 of the Supporting Statement is **261**. This discrepancy is because the ROCIS burden reflects the following components: field office waiting time + a rough estimate of a 30-minute, one-way, drive burden. 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.