

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 an 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 eligibility and entitlement criteria for each benefit and application requirements.

For qualifying individuals, an application for Title II monthly cash payments is also an application for Title XVIII Hospital Insurance (HI) (as per Section 226 of the *Act*). Entitlement to Hospital Insurance provides eligibility to enroll in Supplemental Medical Insurance (SMI) (Sections 1831 and 1836 of the *Act*).

2. Description of Collection

SSA uses various forms of communication to inform the public of the programs we administer, including written publications, brochures, and news releases available through the SSA website, which allow the public to read information regarding all current SSA programs and eligibility factors. Additionally, SSA's outreach efforts include social media, digital services, print and television advertisements, as well as aid from community partners who provide information to the public. SSA representatives at field offices and teleservice centers can assist in the process of benefit applications, encouraging online services or scheduling either telephonic or in-person appointments. Those comfortable with online services may file online using the Internet Claim (iClaim) System which offers help screens to aid the public in completing the self-help application.

SSA uses the information gathered through 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 (in-person or over the phone), during which SSA employees enter applicant data directly into the Modernized Claims System (MCS); or 3) using the

Internet Claims (iClaim) System. In limited situations i.e., applications for Reduced Retirement (SSA-1), SSA technicians can also enter applicant data directly to the Consolidated Claim Experience (CCE) System as part of the testing phase.

Third-party representatives of applicants can use any of these modalities to submit an application on behalf of the beneficiaries 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 (RIB): SSA uses Form SSA-1 to determine eligibility to retirement insurance benefits.
- SSA-2 – Application for Wife’s or Husband’s Insurance Benefits: SSA uses Form SSA-2 to determine eligibility to spouses’ or divorced spouses’ insurance benefits.
- SSA-16 – Application for Disability Insurance Benefits (DIB): SSA uses Form SSA-16 to determine non-disability eligibility to Disability Insurance benefits under Title II of the *Act*.

SSA no longer prints and delivers paper copies of the SSA-1 and SSA-2 forms to field offices since printable and fillable versions are available on our website. SSA prints and delivers paper copies of the SSA-16 form to field offices on a limited basis as the form is available as fillable on our website.

Beneficiaries can also submit Form SSA-1, SSA-2, and SSA-16 as fillable and electronically signable webforms through our Upload Documents portal (OMB No. 0960-0830). The fillable webforms are a mirrored version of the paper forms. In situations where individuals submit a paper application either by mail or Upload Documents, an SSA technician reviews the information, manually enters the information into MCS, and determines what additional development is needed to pay benefits. This modality often requires additional contact with the beneficiary to either clarify information or request additional information based on the provided information.

Interview in-person or telephone:

MCS mirrors the Retirement, Wife’s and Husband’s, and Disability paper application formats using an electronic collection method. Guided by the interactive MCS or CCE collection screens, an SSA technician interviews the applicant either by phone or in person and enters the information directly into SSA’s application System. Currently the CCE System is limited to take claims from individuals residing within the US and filing for reduced Retirement only (age 62 to age 64 & 6 months) through an interview (in-person or phone). MCS or CCE prompts the SSA technician with the required questions based on the type of application the applicant files, and the applicant’s initial responses. MCS or CCE also propagates information to other screens within the MCS or

CCE System to guide the interview and record evidence (if provided at the time of the interview). SSA technicians use MCS or CCE to print an application summary for the claimant to review and sign either through verbal attestation or if the claimant insists a wet signature. In contrast to the paper application, the interview via MCS or CCE process offers the following advantages: 1) it allows technicians to clarify questions which 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 claimants to clarify responses.

Internet Claim (iClaim) Application:

iClaim is an online self-help platform that mirrors the MCS format. The public can use iClaim to complete and submit an application 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. After completing the online application, respondents can sign and submit it electronically to SSA, avoiding the need to visit an SSA office.

Individuals who are completing the DIB application using the iClaim System also answer the question, “Do you intend to file for SSI?” When respondents answer “yes,” iClaim will automatically include an internet SSI (iSSI) application (OMB No. 0960-0842) for the applicant to complete. Completing the DIB and SSI application questions is the first step of the online process and recipients are automatically directed to the other needed steps within the path: providing medical information (OMB No. 0960-0579) and signing a medical release (OMB No.0960-0623). This process is seamless to the recipient as the iClaim system flows from one page to another without interruption.

There are two types of responders that can complete and submit an application via iClaim: first-party respondents and third-party respondents. **First-party iClaim respondents** are individuals (claimants) who are filing on their own behalf and therefore complete, electronically sign, and submit the application. They may have to submit supplementary supporting documents (e.g., medical evidence for disability benefits applications) to finalize the entitlement process. **Third-party iClaim respondents** are individuals who complete and submit an online application on behalf of a claimant. A third-party respondent cannot electronically sign the online application for the claimant. However, this process helps claimants by eliminating the need for them to visit a field office.

After a third-party respondent submits an online application, SSA sends a copy of the application directly to the claimant showing the information the third-party respondent provided. The claimant must review, correct answers as needed, and sign the application confirming the information and their intent to file for benefits and submit it to SSA. Once SSA receives the signed application, and any supplemental information, if necessary, we process the application. To help expedite the process, SSA technicians

contact claimants via telephone to confirm their intent to file, go over the information provided, and record their signature using the attestation process.

We identified the following psychological costs based on the requirements for this information collection:

Psychological Cost #1:

- **Requirements for Program:** The applications for Retirement, Wife's or Husband's, and Disability benefits collect information from respondents and use it to determine eligibility for payable benefits. SSA also collects additional medical information for Disability applications to support a medical determination of eligibility.

Note: The intent of the application process is to provide a collection tool that is user friendly and provides an ease of access, while providing SSA with the information needed to make determinations for benefits. SSA uses the information collected to determine insured status and eligibility for benefit payments and may branch out to explore other possible entitlements based on the respondents' answers.

- **Psychological Cost:** We acknowledge that some respondents may consider these questions too personal and intrusive, causing those respondents to skip those questions or refuse to provide clear or accurate information. This may lead to frustration and uncooperative respondents, and possibly cause the respondents to submit incomplete applications or abandon the application entirely.

The respondents are members of the public who wish to apply for retirement, spouse, or disability benefits, or other third-party responders who help claimants in applying for benefits.

3. Use of Information Technology to Collect the Information

Under the agency's Government Paperwork Elimination Act plan, SSA offers a self-help electronic version of this information collection through our Internet-based, iClaim application. Based on SSA current Management Information (MI) data for FY23, approximately 61% of respondents submit their applications via this electronic method.

In addition, SSA also offers the public the option to submit this information through an interview process (either in-person or via telephone) during which an SSA employee keys responses directly into our Intranet-based Modernized Claims System or CCE. While MCS and CCE does not provide the self-help option of our Internet-based iClaim application, it affords the public another modality other than using the paper forms to submit this information. Per our current MI data, we estimate that approximately 38% of respondents use the personal Interview option to submit this information to SSA.

Finally, we also offer the public the option to complete, electronically sign, and submit the fillable webforms for the SSA-1, SSA-2, and SSA-16 via the Upload Documents

portal (OMB No. 0960-0830). We account for the burden on the public for submitting these forms via Upload Documents under the information collection request for Upload Documents (0960-0830), and, therefore, we do not include that burden here.

4. Why We Cannot Use Duplicate Information

We also collect the information for which we use each of these applications with other Title II, Title XVI and Title XVIII applications or through a protective filing request using the Enhance Leads and Applications System (eLAS) or Internet appointment (iAppointment) Systems (OMB No. 0960-0822). We are able to reduce the collection of redundant information by storing prior collected data (i.e., information on a prior benefit application) into SSA internal databases as allowed by Systems of Record Notices (SORN) 60-0059 and 60-0089. Any data we previously collected propagates into the MCS claims path for the technician to verify and update as 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

We did not consult with the public in the renewal of this form.

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) 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 for individuals filing online:

- 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

SSA calculated the below burden using our management information data by estimating the amount of time respondents take to learn about the program; receive notices as needed; read and understand instructions; gather the data and documents needed; answer the questions and complete the information collection instrument; schedule any necessary appointment or required phone call; consult with any third parties (as needed); and wait to speak with SSA employees (as needed). In addition, we also considered any potential psychological costs associated with completion of this collection when calculating the burden.

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

SSA-1

Modality of	Number of	Frequency	Average	Estimated	Average	Average	Total Annual
-------------	-----------	-----------	---------	-----------	---------	---------	--------------

Completion	Respondent s	of Response	Burden Per Response (minutes)	Annual Burden (hours)	Theoretical Cost Amount (dollars)*	Wait Time in Field Office or for Teleservice Centers (minutes)**	Opportunity Cost (dollars) ***
Paper version (SSA-1) ⁺	17,604	1	11	3,227	\$31.48*		\$101,586***
Interview / Phone MCS	1,679,321	1	10	279,887	\$31.48*	19**	\$25,551,435***
Interview / Office MCS	51,648	1	10	8,608	\$31.48*	23**	\$894,221***
Internet First Party	1,835,958	1	15	458,990	\$31.48*		\$14,449,005***
Third party initiated (complete and submit)	81,810	1	15	20,453	\$31.48*		\$643,860***
Totals	3,666,341			771,165			\$41,640,107***

SSA-2

Modality of Completion	Number of Respondents	Frequenc y of Response	Average Burden Per Response (minutes)	Estimated Annual Burden (hours)	Average Theoretical Cost Amount (dollars)*	Average Wait Time in Field Office or for Teleservice Centers (minutes)**	Total Annual Opportunity Cost (dollars) ***
Paper version (SSA-2) ⁺	6,723	1	15	1,681	\$31.48*		\$52,918***
Interview / Phone MCS	358,225	1	14	83,586	\$31.48*	19**	\$6,202,316***
Interview/ Office MCS	8,227	1	14	1,920	\$31.48*	23**	\$159,730***

Internet First Party	119,129	1	15	29,782	\$31.48*		\$937,537***
Totals	492,304			116,969			\$7,352,501***

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 or for Teleservice Centers (minutes)**	Total Annual Opportunity Cost (dollars) ***
Paper version (SSA-16) ⁺	46,032	1	20	15,344	\$31.48*		\$483,029***
Interview / Phone MCS	723,281	1	19	229,039	\$31.48*	19**	\$14,420,295***
Interview / Office MCS	10,843	1	19	3,434	\$31.48*	23**	\$238,933***
Internet First Party	667,806	1	15	166,952	\$31.48*		\$5,255,649***
Internet Third party	561,014	1	15	140,254	\$31.48*		\$4,415,196***
Totals	2,008,976			555,023			\$24,813,102***

Grand Total

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 or for Teleservice Centers (minutes)**	Total Annual Opportunity Cost (dollars) ***
Totals	6,167,621			1,443,157			\$73,805,710***

+ We only use the paper forms in situations when we are not able to conduct a personal interview, or when the respondent is unable to use the Internet Claim (iClaim) system.

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

** We based this figure on the average FY 2025 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)****
4,005,715	1	30	2,002,858	\$63,049,970****

**** 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 calculated the following Learning Cost time burden based on the estimated time and effort we expect respondents will take to learn about this program, its applicability to their circumstances, and to cover any additional research we believe respondents may need to take to understand how to comply with the program requirements (beyond reading the instructions on the collection instrument):

Total Number of Respondents	Frequency of Response	Estimate Learning Cost (minutes)	Estimated Total Annual Burden (hours)	Total Annual Learning Cost (dollars)*****
6,167,621	1	9	925,143	\$29,123,502*****

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

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 **average time in minutes per information collection shown in our chart above** accurately shows the average burden per response for learning about the program; receiving notices as needed; reading and understanding instructions; gathering the data and documents needed; answering the questions and completing the information collection instrument; scheduling any necessary appointment or required phone call; consulting with any third parties (as needed); and waiting to speak with SSA employees (as needed). Based on our current management information data, the current burden information we provided is accurate. The total burden for this ICR is **1,443,157** burden hours (reflecting SSA management information data), which results in an associated theoretical (not actual) opportunity cost financial burden of **\$165,979,182**. 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 **\$5,763,320,170**. 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	\$6,185
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	\$5,762,047,904
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	\$1,266,081
Quantifiable IT Costs	Any additional IT costs	\$0*
Total		\$5,763,320,170

* 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 2020, the burden was 1,383,743 hours. However, we are currently reporting a burden of 1,443,157 hours. This change stems from an increase in the number of responses from 5,947,974 to 6,167,621. There is a change to the number of responses due to the increase in Internet/iClaim filings. These figures represent current Management Information data.

* Note: The total burden reflected in ROCIS is **3,328,797**, while the burden cited in #12 of the Supporting Statement is **1,443,157**. 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 + learning costs. 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

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.