

Supporting Statement for Form SSA-781
Certificate of Responsibility for Welfare and Care of Child Not in Applicant's Custody
20 CFR 404.330, 404.339-404.341 and 404.348-404.349
OMB No. 0960-0019

A. Justification

1. Introduction/Authoring Laws and Regulations

Sections 202(b)(1)(B), 202 (c)(1)(B), and 202(g)(1)(E) of the *Social Security Act (Act)*, and 20 CFR 404.330, 404.339-404.341, and 404.348-404.349 of the *Code of Federal Regulations*, contain the “in-care” entitlement requirement and the conditions under which a claimant meets it. A requirement for entitlement to Social Security benefits as a mother, a father, a surviving divorced mother or father, or as a spouse who is under age 62, is that the spouse under age 62; the surviving divorced mother or father; the mother; or the father must have in their care an entitled child (under age 16 or disabled). If the child is not living with the claimant, the claimant must complete Form SSA-781.

2. Description of Collection

To qualify for mother’s/father’s, surviving divorced mother’s/father’s, or spouse’s (under age 62) benefits, the claimant must have in-care an entitled child of the number holder, and the child must be under age 16 or disabled. If the child is not living with the claimant, the claimant must complete Form SSA-781, Certificate of Responsibility for Welfare and Care of a Child Not in Applicant’s Custody. The claimant either completes and submits Form SSA-781 as a static PDF through our Upload Documents portal (0960-0830) or through a personal interview with an SSA technician (either in a field office or over the telephone). For those who choose the personal interview, the SSA technician completes the claimant’s application, then either hands or mails the form to the claimant. SSA uses Form SSA-781 to determine if non-custodial parents who file for mother's or father's, surviving divorced mother's or father's, or spouse’s (under age 62) benefits meet the child-in-care requirement. Claimants may provide information personally or solicit information from others to complete the form.

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

- **Psychological Cost #1:**
 - **Requirement for the Program:** The SSA-781 requires the applicant to provide information that will be used to determine entitlement to benefits.
 - **Psychological Cost:** Some respondents may find completing the form stressful as they know their responses will be used to determine if they meet the child-in-care requirement for entitlement to the benefits for which

they are applying.

We understand these psychological costs may cause respondents to delay their completion of the information collection or cause them to abandon the information collection entirely. However, we require full completion of this collection to receive benefits. Therefore, we have taken this potential psychological cost into account when calculating our burden in #12 below.

The respondents are applicants for spouse's; mother's; father's; or surviving divorced mother's or father's Social Security benefits.

3. Use of Information Technology to Collect the Information

Per our recent risk assessment, we require a signature on this form because there is a need to bind a party to this document because we will use the information provided to determine if the respondent meets the entitlement requirements.

Even so, as mentioned above, this collection has a public-facing fillable and submittable PDF version which the respondent can submit using SSA's Upload Documents Portal (OMB No. 0960-0830). Upload Documents allows the respondent to complete the static fillable PDF, electronically sign it, and submit the information through the Upload Documents Portal. The submittable version mirrors the paper version and provides respondents with an online service option as an alternative to mailing, faxing, or bringing the form to an SSA field office. Use of the Upload Documents Portal does not require respondents to download and install the application locally on their device or pay any subscription or licensing fees, and we account for the burden to navigate to the form in Upload Documents under OMB No. 0960-0830. Since the burden for completing the static PDF remains the same as filling the form out with an SSA technician, we do not show any separate burden for the fillable PDF version in #12 below.

This collection does not currently have a fully electronic 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.

4. Why We Cannot Use Duplication 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 this information, we would not be able to determine whether the claimant meets the statutory “child-in care” requirement. 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 February 26, 2026, at 91 FR 9671, and we received no public comments. The 30-day FRN published on April 24, 2026, at 91 FR 22195. 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 development revision of this form.

9. Payment or Gifts to Respondents

SSA does not provide payment 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 of 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-781 | 478 | 1 | 5 | 40 | \$32.66* | 35** | \$10,419*** |

* We based this figure on average U.S. citizen’s hourly salary, as reported by Bureau of Labor Statistics data ([Occupational Employment and Wage Statistics](#)).

** We based this figure on the average combined FY 2026 wait times for field offices (22 minutes) and for teleservice centers (48 minutes which includes the average speed of answer of 7 minutes as well as the average 41-minute wait time for a call back from an SSA technician), based on SSA’s current management information data. This figure reflects both data from our systems and the data

posted on our public facing website ([Social Security performance | SSA](#)) on the date we drafted this document. As the figures fluctuate daily, the wait times may be different on the website than they appear here. We continue to monitor our website and management information data on call back times to ensure we report updated figures when possible.

Note: Since respondents using Upload Documents complete the same fillable PDF as those who use the personal interview option, we did not separate out the burden for each modality, since the burden is the same. However, the small percentage of respondents (approximately 20%) who choose to use Upload Documents to complete this form have no telephone or in-office wait time.

*** 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)**** |
|--|-----------------------|---|---|---|
| 382 | 1 | 30 | 191 | \$6,238**** |

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

We did not include a separate Learning Cost for this information collection, as we include the Learning Cost in the burdens listed in the 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 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 40 burden hours (reflecting SSA management information data), which results in an associated theoretical (not actual) opportunity cost financial burden of \$16,657. 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 the Federal Government

The annual cost to the Federal Government is approximately \$6,171. 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 | \$750 |
| 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 | \$2,001 |
| 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, | \$3,420 |

| | | |
|-----------------------|-------------------------|----------------|
| | maintenance | |
| Quantifiable IT Costs | Any additional IT costs | \$0* |
| Total | | \$6,171 |

* 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. We do not track design costs or upkeep costs (as these are based on employee time and may vary from collection to collection). 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. Finally, SSA prefers not to provide breakdowns of estimated payment to employees who process these items for a variety of reasons (only one of which is that it is not possible to do this entirely accurately).

15. Program Changes or Adjustments to the Information Collection Request

When we last cleared this IC in 2023, the burden was 33 hours. However, we are currently reporting a burden of 40 hours. This change stems from an increase in the number of responses from 390 to 478. 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 **279**, while the burden cited in #12 of the Supporting Statement is **40**. This discrepancy is because the ROCIS burden reflects the following components: field office/telephone 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.