

Supporting Statement for Form SSA-L706
Letter to Custodian of Birth Records
20 CFR 404.704, 422.103-422.110
OMB No. 0960-0693

A. Justification

1. Introduction/Authoring Laws and Regulations

Sections 205(a) and 702 of the *Social Security Act (Act)* authorize the Commissioner of the Social Security Administration (SSA) to make rules, regulations, and establish procedures providing for the collection and furnishing of necessary evidence.

Sections 20 CFR 422.103 – 422.110 of the *Code of Federal Regulations (Code)* establish SSA’s policies and procedures related to applications and assignments of Social Security Numbers (SSNs), as well as requests for revised or replacement SSN cards. Per 20 CFR 404.704, 20 CFR 422.107 of the *Code*, SSN applicants must submit convincing documentary evidence of identity, age, and citizenship to SSA. SSA recognizes that some individuals may need assistance in obtaining evidence.

We use the SSA-L706, Letter to Custodian of Birth Records, to assist individuals who require proof of their age, and cannot obtain it through other means.

2. Description of Collection

While applicants normally have the responsibility for furnishing proofs that are necessary to support their claims, the agency recognizes the need to assist in certain circumstances. To aid the applicant, we use the SSA-L706, an agency-initiated letter requiring the SSN applicant’s signature and usually payment, often in the form of a check. In accordance with the [Intelligence Reform and Terrorism Prevention Act \(IRTPA\)](#), SSA verifies all documents submitted by U.S. born applicants as evidence of age for an original SSN card, except those processed through the enumeration at birth (EAB) process.

When individuals need assistance obtaining evidence of their age in connection with SSN card applications or benefits claims, SSA prepares the SSA-L706, Letter to Custodian of Birth Records. SSA uses Form SSA-L706 to verify the proof of age when an SSN applicant submits a birth record that the Social Security Number Application Process (SSNAP) system deems questionable. Typically, SSA verifies birth records (i.e., birth certificates) with the custodian of the record or issuing entity before processing the SSN card application via an online query such as the Electronic Verification of Vital Events (EVVE) or other SSA-approved online access systems. However, when the applicant submits alternative evidence to request an original SSN card or to correct a date of birth (DOB) that SSA cannot verify via an online query (i.e., the custodian/issuing entity of the birth record is a hospital or health care provider), we use the SSA-L706 to verify proof of age for enumeration purposes. The SSNAP system pre-fills a PDF version of the SSA-L706 using information from the SSN application to ensure accuracy and efficiency. SSA uses the letter to verify with the custodian or issuing entity, when necessary, the authenticity of the record the SSN applicant or claimant submitted.

In addition, when a birth or religious record is needed for proof of age and the applicant needs assistance obtaining these proofs, the field office (FO) will complete the SSA-L706. The form is not available on a public facing website, but it's available for the technician to use if the documents the applicant presented are questionable and we are unable to verify through EVVE and manual verification is required.

SSA mails the SSA-L706 to the respondents, who then complete and return by mail or fax. Once we have the completed form, SSA sends it to the custodian of the record to obtain verification or records as needed.

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

- **Psychological Cost:**
 - **Requirement for the Program:** We request identifying information from the applicant, including fields for Name, DOB, Sex, etc, and we require the use of this form when the agency questions the validity of the applicant's submitted evidence.
 - **Psychological Cost:** The applicant may consider this an invasion of privacy, or believe the agency mistrusts them, as SSA is questioning the evidence they submitted, or considering it insufficient.

We understand this psychological cost may cause respondents to delay their completion of the information collection or cause them to abandon the information collection entirely. However, we require the applicant to submit valid proof of age in order to receive an SSN card. Therefore, we have taken this potential psychological cost into account when calculating our burden in #12 below.

The respondents are SSN applicants who sign the request; as well as State and local bureaus or agencies of vital statistics, and religious entities who submit the information regarding evidence of age for the SSN applicant.

3. Use of Information Technology to Collect the Information

This information collection does not currently have a fully public-facing Internet version. Given the low number of respondents that utilize this form, SSA determined it would be more efficient not to prioritize this ICR for conversion to a fully submittable PDF at this time, nor do we believe it necessary to explore the option for this form to be uploaded or returned via email due to the low number of individuals that use this form. Since we only use this form when the child is not enumerated through EAB, or when the birth certificate cannot be verified through EVVE, and the document presented seems questionable to the technician and needs help from SSA to verify the document, which happens in rare cases, we are not prioritizing this form for electronic submission at this time.

However, we allow respondents to type their names in the signature block in lieu of a wet signature and have no restrictions on the format or type of signature(s) included on the document. In addition, the technician can input the information directly into SSNAP (OMB No. 0960-0066) as needed, if the respondents prefer to use an interview process to submit the information.

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-L706, SSA would not be able to verify the SSN applicant's age and therefore would be unable to provide requested services to the public. We only collect the information as needed, and less frequent collection is not feasible. 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 or maintenance of this form.

9. Payment of Gifts to Respondents

When a fee requires payment, the requester pays the custodians of birth records (e.g., State and local agencies) in accordance with their fee schedules. SSA pays on behalf of an SSN applicant in situations meeting the requirements of our operating instructions. The circumstances under which SSA will pay on behalf of the SSN applicant are the following:

Lost Evidence

Sometimes an SSN applicant may allege that evidence provided to SSA was lost in the mail or lost in SSA's handling process. If there is an indication that SSA had the evidence, e.g., SSA took action based on the document received, then SSA replaces the document. In these instances, SSA may pay for the evidence if we can only obtain duplicate evidence by paying a fee.

Enumeration

It is generally the responsibility of the SSN card applicant to submit the evidence required to establish eligibility for an SSN; however, SSA may purchase evidence for enumeration purposes in certain circumstances (e.g., SSA lost the applicant’s evidence, or the applicant reports not receiving the returned document in the mail).

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

The following chart shows the annual burden for this form:

Method of Completion	Number of Respondents	Frequency of Response	Average Burden Per Response (minutes)	Estimated Total Annual Burden (hours)	Average Theoretical Hourly Cost Amount (dollars)*	Total Annual Opportunity Cost (dollars)**
SSA-L706 - (SSNAP)	573	1	10	96	\$24.14*	\$2,317**
SSA-L706 - (Respondents Signature Only)	573	1	1	10	\$32.66*	\$327**
Totals	1,146			106		\$2,644**

* We based these figures on the average U.S. worker’s hourly wages (Occupational Employment and Wage Statistics) and on the average Information and Record Clerks hourly wage ([Occupational Employment and Wage Statistics](#)) as reported by Bureau of Labor Statistics 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: SSA does not currently have a way to track counts of the SSA-L706 forms directly from SSNAP application. Therefore, the provided number is an estimate based on the number of downloads of the form.

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 calculation of the time burden for this collection. OIRA based their estimation on 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)***
573	1	30	287	\$9,373***

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

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.

Note: We do not have any recorded learning costs for this information collection, as the respondents learn about it when we issue the form, and SSA technicians walk them through the process.

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 the 1 or 10 minutes shown in our chart above 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 **106** burden hours (reflecting SSA management information data), which results in an associated theoretical (not actual) opportunity cost financial burden of **\$12,017**.

13. Annual Cost to the Respondents

Other than as outlined in #9 above, 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 **\$122,234**. 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	\$575
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	\$118,000
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	\$3,659
Quantifiable IT Costs	Any additional IT costs	\$0*
Total		\$122,234

* 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

Since the last clearance in 2023, burden hours have remained at 106. Burden time per response is unchanged. These figures represent current Management Information data.

* Note: The total burden reflected in ROCIS is **392**, while the burden cited in #12 of the Supporting Statement is **106**. This discrepancy is because the ROCIS burden also reflects the estimated travel costs for individuals who need to provide a signature only. 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. 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. Collections of Information Employing Statistical Methods

SSA does not use statistical methods for this information collection.