Supporting Statement for Form SSA-10
Application for Widow's or Widower's Insurance Benefits
20 CFR 404.335-404.338, and 404.603
OMB No. 0960-0004

A. Justification

1. Introduction/Authoring Laws and Regulations

Sections *202(e)* and *202(f)* of the *Social Security Act (Act)* set forth the requirements for entitlement to widow(er)'s benefits, including the requirement to file an application. In addition, *20 CFR 404.335-404.338* of the *Code of Federal Regulations (Code)* state the policies for implementing the requirements from Sections *202(e)* and *202(f)* of the *Act*, including the requirement to apply for benefits. *20 CFR 404.603* of the *Code* requires a claimant to file an application to become entitled to benefits. Therefore, the Social Security Administration (SSA) designated Form SSA-10 to meet the application requirement.

2. Description of Collection

SSA uses Form SSA-10 to make a formal determination for entitlement to widow(er)'s benefits. An applicant may be entitled to widow(er)'s benefits as the deceased number holder's (NH) widow(er), surviving divorced spouse, or disabled widow(er).

In some cases, spouse's benefits are converted to widow(er)'s benefits without an application. SSA does not require an SSA-10 when the widow(er) was entitled to spouse's benefits as a legal spouse, and when the widow(er) meets the following requirements at the time SSA received notice that the NH died:

- Full retirement age (FRA) or older;
- Under FRA with an entitled child in care; or
- Age 62 through the month before FRA when the NH dies. If the spouse is also entitled to a retirement or disability insurance benefit, a Certificate of Election (SSA-4111) is required to receive reduced benefits.

When an applicant is applying for benefits as a disabled widow(er), SSA requires them to also complete form SSA-3368-BK , Disability Report-Adult (OMB NO. 0960-0579).

SSA may require supporting documentation from the widow(er) in the following circumstances:

- **Proof of respondent's age:** If SSA has not previously established age and the proof of age tolerance does not apply. In general, the tolerance applies if the claimant is a U.S. born citizen, a foreign-born U.S. citizen, or a naturalized U.S. citizen, and alleges a date of birth that is not materially discrepant with any of the dates of birth shown on their Numident record.
- **Proof of NH's age**: If SSA has not previously established the NH's age and proof of tolerance does not apply, SSA requires proof of the NH'S age when the NH age affects insured status, the Primary Insurance Amount, or when

SSA uses the year the NH attained age 72 to determine the NH obtained the required quarters of coverage.

- **Proof of death**: If SSA does not have proof of death in SSA's records, SSA requires the applicant to provide proof of death to SSA.
- **Proof of marriage:** If SSA cannot verify proof of marriage through prior claims which includes statements on a prior Form SSA-2, Social Security Benefits Application (Internet, Retirement Survivor & Disability) (OMB. No. 0960-0618) and Form SSA-3, Marriage Certification (OMB No. 0960-0009).
- **Proof of termination of marriage**: If SSA cannot verify the termination of marriage through SSA record, SSA requires the respondent who is applying as a surviving divorced spouse to provide SSA with proof of termination of the marriage. SSA uses this information to determine whether the respondent meets the 10-year marriage duration requirement.
- **Proof of income of deceased:** SSA requires the respondent to provide proof of the deceased's income, if SSA needs lag earnings (unposted earnings in the current, proceeding year, or both) to determine the deceased insured status, or if the respondent requests SSA use lag earnings to calculate benefits.
- **Proof of income of respondent: S**SA requires the respondent to provide proof of income, if deemed filing applies and SSA uses the respondent's lag earnings to determine entitlement to spouse's benefits,

In some cases, SSA may use information already on file about the deceased to support answers to:

- **Questions 7 and 8 regarding the deceased's income.** SSA may use the answers to questions 7 and 8 to determine if all of the deceased earnings were posted to the Master Earnings File (MEF) for the year of death and the year before death, and to ensure accuracy of the deceased's earnings record.
- **Question 10 regarding the deceased's former marriages.** SSA cannot disclose to a claimant information provided by other individuals, but we may use information regarding the deceased's former marriages to determine if there is any reason to question information provided by the respondent.
- **Questions 21 and 22 regarding the survivor's recent income.** For all initial in-office and telephone claims, SSA technicians review the earnings posted to the MEF with the claimant during the claims interview to ensure accuracy and completion. When applicable, technicians explain to the claimant that SSA calculates monthly benefit amounts using the claimant's highest 35 years of indexed earnings and that in some cases, additional work could increase the benefit amount. Occasionally, SSA may not have the surviving spouse's total earnings for the prior or current year because employers or other reporting entities have not yet reported those earnings to SSA. SSA does not maintain

records of monthly earnings, which are relevant to apply the monthly earnings test.

In FY 2025, SSA processed 613,607 claims for widow's or widower's insurance benefits. Out of the 613,607 claims, SSA processed 388,927 (63.4%) claims the same day the application was filed (single touchpoint). For the remaining claims, SSA made additional contacts to obtain evidence of relationship that was not available during the initial interview with SSA(multiple touchpoint). Of the 613,607 claims for widow's or widower's insurance benefits SSA processed in FY 2025, SSA denied 22,559 claims. SSA denied these claims for various reasons, including the respondents': lack of insured status; not meeting the duration of marriage requirement; or failure to prove relationship with the deceased NH.

SSA has several common pathways a widow(er) could learn about widow(er)'s benefits and how to apply for them.

1) If the Funeral Director (FD) uses Form SSA-721 (Statement of Death by Funeral Director) to report a death to SSA, they give the "fact sheet" portion of this form (pages 2 and 3) to any survivors of the deceased. These pages provide important information about who can get survivors benefits and how to apply for them. If SSA receives an SSA-721 that identifies a widow(er) of the deceased, this is a lead for potential entitlement to widow(er)'s benefits. SSA contacts the widow(er) to explore potential entitlement to widow(er)'s benefits.

2) If the FD registers the death by using the Electronic Death Registration (EDR), which links to the State Bureau of Vital Statistics computer system, SSA asks the FD to help get information to potential survivors who may be entitled to benefits by distributing the "fact sheet" portion of the SSA-721 to families. The EDR reports do not establish a lead, because they do not contain information regarding survivors.

   SSA conducts various outreach to funeral homes, funeral directors, and associated organizations, including presentations and providing pamphlets, to get the message out about Social Security survivor benefits.

3) SSA also uses various forms of communication to inform the public of the benefits 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 phone or in-person appointments. The SSA technician may ask the respondent to provide documents to support their eligibility for widow(er) benefits. The widow(er) can also find information about documents SSA may request to support their application on SSA's website.

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

<u>**Psychological Cost #1:**</u>

- **Requirement for Program:** Form SSA-10 requires the applicant to provide SSA with information which SSA will use to determine the applicant's entitlement to widow(er)'s benefits.

- **Psychological Cost:** Some applicants may experience stress when completing the SSA-10, because SSA uses their responses to determine whether they mee the requirements for entitlement to the widow(er)'s benefits. Applicants who are still mourning the loss of a loved one may experience additional emotional stress while completing the SSA-10.

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 widow(er)'s benefits.

3. Use of Information Technology to Collect the Information

Form SSA-10 is available on SSA's website for respondents to download, print, complete and mail back to SSA. In addition, an SSA employee collects information from the respondent during an in person or telephone interview, and enters the information into SSA's Modernized Claims System (MCS).

This collection has a public-facing fillable and submittable version which the respondent can submit using SSA's Upload Documents Portal (OMB No. 0960-0830). Upload Documents allows the respondent to complete the 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 for using Upload Documents under OMB No. 0960-0830.
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 scheme, but this may be unconnected to the PRA approval lifecycle.

4. Why We Cannot Use Duplicate Information

Some of the information we collect using the SSA-10 is also collected through other Title II, Title XVI and Title XVIII applications for their purpose. SSA reduces the collection of redundant information by storing person-centric data (i.e., date of birth, citizenship, marriage data, contact information) when we first collect it. When using a system application such as MCS, person-centric data which we previously collected will propagate into the claims path for the technician to verify and update when necessary. This data propagation currently applies only to MCS and in future CCE interviews.

When respondents submit the SSA-10 through the Upload Documents application, they authenticate through their my Social Security account. The Upload Documents applications accesses the authenticated account information and propagates only the respondent's name and SSN.

When SSA receives the paper version of the SSA-10, an SSA technician manually enters the information into MCS which propagates the applicant's name and date of birth. If the applicant has a file with SSA with their marriage data MCS propagates the applicant's marriage 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-10, the respondents would not have a means to apply for widow(er)'s benefits under the OASDI program. Because we collect this information on an as needed basis, 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 April 27, 2026, at 91 FR 22569, and we received no public comments. The 30-day FRN published on June 26, 2026, at 91 FR 38748. 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 4*2 U.S.C. 1306*, *20 CFR 401* and 4*02, 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:

Method of Completion	**Number of Respondents**	**Frequency of Response**	**Average Burden Per Response (minutes)**	**Estimated Total Annual Burden (hours)**	**Average Theoretical Cost Amount (dollars)***	**Average Wait Time in Field Office or Teleservice Centers (minutes)****	**Total Annual Opportunity Cost (dollars) *****
SSA-10 (Paper)	1,845	1	30	923	$33.54*		$30,957***
SSA-10 (Upload Documents)	1,516	1	30	758	$33.54*		$25,423***
SSA-10 (MCS/In-person Interview)	74,474	1	30	37,237	$33.54*	20**	$2,081,559***
SSA-10 (MCS/ Telephone Interview)	490,129	1	30	245,065	$33.54*	46**	$20,822,672***
Totals	**567,964**			**283,983**			**$22,960,611*****

*We based this figure on the average U.S. worker's hourly wages for all occupations, as reported by Bureau of Labor Statistics data (Occupational Employment and Wage Statistics).

**We based this figure on the average FY 2026 wait times for field offices (20 minutes) and for teleservice centers (46 minutes which includes the average speed of answer of 5 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.
*** 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. **<u>There is no actual charge to respondents to complete the application</u>**.

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)******
74,474	1	30	37,237	$1,248,929

****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 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)*******
567,964	1	13	123,059	$4,127,399****

*****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.

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 **30** 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 **283,983** burden hours (reflecting SSA management information data), which results in an associated theoretical (not actual) opportunity cost financial burden of **$28,336,939**. 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 **$12,289,959**. 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	$2,651
Distribution, 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	$11,837,308
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	$450,000
Quantifiable IT Costs	Any additional IT costs	$0*
Total		**$12,289,959**

* 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 2023, the burden was 286,328 hours. However, we are currently reporting a burden of 283,983 hours. This change stems from a decrease in the number of responses from 572,656 to 567,964. Although the number of responses changed, SSA did not take any actions to cause this change. There is no change to the burden time per response. These figures represent current Management Information data.

*** Note:** The total burden reflected in ROCIS is **844,868** while the burden cited in #12 of the Supporting Statement is **283,983**. 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

[Use the template language that works best here].

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.