

Supporting Statement for Form SSA-7
Application for Parent's Insurance Benefits
20 CFR 404.370-404.371, 404.373-404.374, and 404.601-404.603
OMB No. 0960-0012

A. Justification

1. Introduction/Authoring Laws and Regulations

Section 202(h) of the *Social Security Act (Act)* provides for the payment of monthly benefits to a surviving parent of a deceased worker when the deceased worker was contributing at least one-half of the parent's support at the time of the worker's death or when the worker became disabled. Sections 202, 205, 223, 226, and 806 of the *Act*, as amended, allow us to collect this information. In addition, we have codified these rules in Sections 20 CFR 404.370, 404.371, 404.373, 404.374 and 404.601-404.603 of the *Code of Federal Regulations* prescribe the eligibility criteria and application instructions for these benefits.

2. Description of Collection

SSA uses the information gathered on each agency benefit application to determine eligibility for Social Security benefits and the amount of the benefits. This information collection is voluntary. However, the collection of this information is required for SSA to award or deny monthly benefits as parents of a deceased worker. The respondents are applicants filing for Parent's Insurance Benefits. To be entitled as a parent, the claimant must:

- Be the parent of a worker who died fully insured,
- Have attained age 62,
- Not be entitled to retirement benefits that are equal to or exceeding the amount of the parent's original benefit,
- Not have married after the worker's death (unless an exception applies), and;
- Have been receiving at least one-half of the support from the worker at certain established points in time (and have proof of support within the time limits required).

Individuals interested in filing for Parent's benefits can find information on how to apply as well as information they will need to provide with their application on SSA's website. 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. Respondents can also download and complete Form SSA-7 at www.ssa.gov and mail it back to SSA or submit the fillable pdf form through our Upload Documents portal (OMB No. 0960-0830). They can also call us to schedule an appointment at the field office, where an SSA employee can interview respondents either by phone or in-person and

enter information into our Modernized Claims Systems (MCS).

The following is a list and description of each modality SSA uses to collect information for this benefit application.

Paper Application Form:

Form SSA-7 is the “Application for Social Security Parent’s benefits” we use to determine an individual eligibility to Parent’s insurance benefits. Although SSA no longer prints and delivers paper copies of the SSA-7 form to field offices, the form is available on our intranet and internet website. Responders can submit the fillable pdf form through our Upload Documents portal (OMB No. 0960-0830) or by mail. The fillable pdf form is a mirrored version of the paper form. 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 applicant to either clarify information or request additional information based on the answers provided.

Personal Interview In-person or Phone:

SSA uses our internal, Modernized Claim System (MCS) screens to collect the same information from the SSA-7 through a personal interview. The MCS screens mirror the SSA-7 paper application formats using an electronic collection method. Guided by the MCS collection screens, an SSA technician interviews the applicant either by phone or in person and inputs the information directly into the MCS application system. MCS prompts the technician with the required questions based on the type of benefit the applicant is applying for, and the applicant’s initial responses. MCS prints an application summary for the claimant to review and sign by either verbal attestation or wet signature. In contrast to the paper application, the interview via MCS offers the following advantages: (1) it 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 applicants to clarify responses.

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

Psychological Cost #1:

- **Requirement for Program:** The SSA-7 requires the applicant to provide information that will be used to determine entitlement to parent’s benefits.
- **Psychological Cost:** We acknowledge that some respondents may find these questions personal and intrusive, causing those respondents to skip those questions or refuse to provide clear or accurate information.

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.

Respondents are individuals filing for Parent's Insurance Benefits.

3. Use of Information Technology to Collect the Information

SSA created a fillable and printable PDF version of Form SSA-7, which is available on our website. SSA also collects information on Form SSA-7 electronically through a personal interview process using MCS. Based on our data, we estimate approximately 70% of respondents under this OMB number use the MCS version.

This collection does not currently have a fully public-facing Internet web 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 information collection record (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 made the fillable PDF version available to the public as a static fillable form which the public can submit electronically through our Upload Documents portal (OMB No. 0960-0830). We estimate about 14% of respondents use the Upload Documents option for electronic submission.

Based on our data, we estimate approximately 84% of respondents under this OMB number submit the information either through the MCS interview, or electronically through Upload Documents.

4. Why We Cannot Use Duplicate Information

Some of the information we collect with the SSA-7 is also collected by other Title II applications as well as our appointment system i.e., eLAS. We are able to reduce the collection of redundant information by storing the collected data in internal SSA systems which can be retrieved and propagated into the claims path for the technician to verify and update when necessary.

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-7, the public would have no way to apply for Parent's insurance benefits. 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 July 31, 2026, at 91 FR 48470, and we received no public comments. The 30-day FRN published on September 24, 2026, at 91 FR 60677. 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 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

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 Hourly Cost Amount (dollars)*	Average Wait Time in Field Office or for Teleservice Centers (minutes)**	Total Annual Opportunity Cost (dollars)***
SSA-7 (Paper mailed)	66	1	30	33	\$33.54*	N/A	\$1,107***
SSA-7 (Fillable PDF, Upload Documents)	60	1	30	30	\$33.54*	N/A	\$1,006***
Interview (MCS)	296	1	30	148	\$33.54*	11**	\$6,775***
Totals	422			211			\$8,888***

* We based this figure on average U.S. citizen's hourly salary (\$33.54), as reported by Bureau of Labor Statistics data ([Occupational Employment and Wage Statistics](#)).

** We based this 11-minute figure on the average combined August 2026 wait times for field offices (21 minutes, as captured by management information data and posted on our public-facing website, ([Social Security performance | SSA](#)) and for teleservice centers (1 minute, which represents the average time it takes for a call to be picked up automatically by our systems and then routed to an SSA technician; this figure also comes from management information data). As the figures fluctuate the actual wait times may differ slightly from the averages reported here. We will update these figures periodically to reflect the most accurate available data. We did not include an in-office wait time for the paper form, as respondents only mail it in; therefore, they do not experience any wait time.

*** This figure does not represent actual costs that SSA is imposing on individuals; rather, these are theoretical opportunity costs for the additional time respondents will spend to complete the information collection. **There is no actual charge to respondents to complete the information collection.**

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)****
296 ⁺	1	30	148	\$3,522****

⁺ We based this figure on half of the number of respondents for the Interview (MCS), as respondents both travel into the FO or call over the phone to complete this modality.

**** 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)*****
422	1	35	246	\$8,251*****

*****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 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 **211** burden hours (reflecting SSA management information data), which results in an associated theoretical (not actual) opportunity cost financial burden of **\$12,661**. 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 **\$950,742**. This estimate accounts for costs from the following areas:

Description of Cost Factor	Methodology for Estimating Cost	Cost in Dollars*
Designing and Printing the	Design Cost + Printing Cost	\$2,793

Form		
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	\$497,949
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		\$950,742

* We have inserted a \$0 amount for cost factors that do not apply to this collection.

** As 84% of the respondents either complete this information collection through as personal interview recorded in MCS, or electronically through Upload Documents (OMB No. 0960-0830), and the 16% who complete the paper form complete the fillable PDF version, which they print and mail to SSA on their own, SSA does not have any distribution or shipping costs for this form.

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. Also, 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 82 hours. However, we are currently reporting a burden of 211 hours. This change stems from an increase in the number of respondents from 329 to 422. Although the number of responses changed, SSA did not take any actions to cause this change. There is also a change to the burden of time per response from 15 minutes to 30 minutes since this type of benefit has become uncommon and the questions are not as familiar as other applications; therefore, responders need additional time to respond and gather the relevant information. These figures represent current Management Information data.

*Note: The total burden reflected in ROCIS is **609**, while the burden cited in #12 of the Supporting Statement is **211**. This discrepancy is because the ROCIS burden reflects the following components: field office waiting time/telephone call system pick-up times + a

rough estimate of a 30-minute, one-way, drive burden + learning costs. In contrast, the chart in #12 above 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.