Supporting Statement for Form SSA-2519
Child Relationship Statement
20 CFR 404.350, 404.355 & 404.731, 404.736(b), 404.760(c), and 404.762(b)
OMB No. 0960-0116

A. Justification

1. Introduction/Authoring Laws and Regulations

Section *216(h)(3)* of the *Social Security Act (Act)* provides the Social Security Administration (SSA) the criteria to use to determine entitlement of minor, biological (natural) children to Social Security benefits under the deemed child provision. Sections *20 CFR 404.350* of the *Code of Federal Regulations (Code)* lists the eligibility requirements for a parent or guardian filing on behalf of a minor child for entitlements to benefits on the earnings record of a deceased, insured Social Security number holder (NH). Section *20 CFR 404.355* of the *Code* lists SSA's requirements for proof of eligibility under the *Act* as the natural child of the insured NH, and Section *404.731* of the *Code* provides a list of the evidence types SSA accepts as proof that someone is a natural parent or child and requires the respondent to show this evidence that the child in question is the natural, biological child of the NH prior to receiving inherited benefits. In addition, Sections *404.736(b), 404.760(c),* and *404.762(b)* of the *Code* give SSA the authority to collect information and evidence of the alleged child's claim of his or her relationship as a biological child of the NH from individuals who may have relevant information or evidence to support the minor child's claim.

2. Description of Collection

When a Social Security number holder (NH) becomes entitled to Social Security retirement or disability benefits, or dies while insured, a child may qualify for benefits on the NH's Social Security record. To receive child's benefits, SSA requires someone who is legally authorized to act on the child's behalf to file an application for the child applicant.. In addition, SSA requires the child to meet the following requirements:

- The child applying must prove he or she is the child of an NH who is entitled to Retirement Insurance Benefits (RIB) or Disability Insurance Benefits (DIB), or who died while fully or currently insured.
- The child is dependent on the NH and unmarried.
- The child is under age 18.
  - Note: A child age 18 or older may qualify if the child has a disability that began before age 22, or if the child is a full-time elementary or secondary school student under age 19.

When an individual files a claim on behalf of a minor child for child's benefits, SSA reviews the information provided and the evidence available in its records to determine whether the child meets the eligibility requirements listed above. If the evidence establishes the child's relationship to the NH and the child meets all eligibility requirements, SSA can continue processing the claim.

If the available evidence does not establish the relationship to the NH, SSA seeks additional information from individuals who may have relevant information or evidence to support the minor child's claim. In these cases, SSA may request that an individual who has knowledge of the relationship between the insured NH parent and the alleged biological children complete Form SSA-2519, Child Relationship Statement, to obtain information about the child's relationship to the NH and identify potential sources of evidence that may help SSA determine whether the child meets the relationship requirement. Specifically, SSA uses the SSA-2519 to develop evidence that (1) the NH acknowledged in writing that the child is his or her biological son or daughter; (2) a court decreed that the child is the NH's biological son or daughter; (3) a court ordered the NH to contribute to the child's support because the child is the NH's biological son or daughter; or (d) shows other satisfactory information which establishes that the child is the NH's biological son or daughter and the NH was either living with the child or contributing to the child's support at the time of application or the NH's death. These questions on the form are relevant for assessing the claim that the NH is the child's parent.

SSA collects the information on Form SSA-2519 through in-person or telephone interviews, or by mailing Form SSA-2519 with a prepaid return envelope for the respondent to complete and return to SSA. An SSA representative may assist the respondent to complete the SSA-2519 (as needed).
If the evidence the claimant submits to SSA is insufficient to establish a child relationship, an SSA technician follows up with the individuals who may have relevant information or evidence to support the minor child's claim to obtain the information listed on the SSA-2519 that may have a bearing on the child's entitlement to benefits. SSA maintains a copy of the SSA-2519, along with any applicable evidence, in the electronic folder for the NH for retention as part of the child's claim file.

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

Psychological Cost #1:

- **Requirement for Program:** Form SSA-2519 requires the respondent to respond to a series of questions about the NH or the child claimant designed to help SSA determine if the child meets the relationship requirement for entitlement to Child's Insurance Benefits, and the respondent may not have answers to all of these questions.
- **Psychological Cost:** The respondents may perceive these questions as unduly invasive. In addition, the respondents may be concerned that the child will not receive benefits depending on how they answer which can put undue pressure on the respondents. These factors can lead to individuals choosing to delay or abandon completing a form.

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 people with knowledge of the relationship between insured worker parents and their alleged biological children who can help SSA determine a child's eligibility for Social Security payments based on the parent's insured status.

3. Use of Information Technology to Collect the Information

SSA created a fillable PDF version of Form SSA-2519 for respondents to download, complete, print, and return to SSA by mail, or bring to a Field office. In addition, SSA mails the SSA-2519 to respondents with a prepaid return envelope to mail back to SSA. SSA does not require a signature on this form. We estimate that 80% of respondents complete the SSA-2519 on their own and mail back to SSA.

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 schema, but this may be unconnected to the PRA approval lifecycle.

In the interim, we evaluated this collection for conversion to a submittable PDF and intend to make this conversion within the next 3-6 years. Once we have the submittable PDF ready for implementation, we will submit a Change Request to OMB for prior approval.

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 collect this information, we may deny possible entitlement to a minor child under the deemed child provision of the *Act.* 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 September 24, 2026, at 91 FR 60685, and we received public comments from 1 commenter. We summarized the comments and responded to them in the attached Addendum.

The 30-day FRN published on November 25, 2026, at 91 FR 76295. 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 Cost Amount (dollars)*	Average Wait Time in Field Office or Teleservice Centers (minutes)**	Total Annual Opportunity Cost (dollars) ***
SSA-2519	4,787	1	15	1,197	$33.54*	10**	$66,912***

* We based this figure on an average U.S. worker's hourly wage ($33.54), as reported by Bureau of Labor Statistics data (Occupational Employment and Wage Statistics).

** We based this 10-minute figure on average November 2026 wait times (specifically, the arithmetic mean of a 19-minute field-office wait time and a 1-minute wait time for a call to be picked up automatically by our systems and then routed to an SSA technician. Both the 19-minute and 1-minute figures are themselves averages captured by management information data and posted on our public-facing website, Social Security performance | SSA. 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. While we included an in-office wait time for the paper form, we note that respondents who mail in the form 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)****
479	1	30	240	$8,050****

****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)*****
4,787	1	5	399	$13,382****

*****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 **15** 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 **1,197** burden hours (reflecting SSA management information data), which results in an associated theoretical (not actual) opportunity cost financial burden of **$88,344**. 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 **$511,116**. 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	$644
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	$60,472
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		**$511,116**

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

** We do not track this data any longer, as we do not require the DDSs to report distribution or shipping costs as a budget line item. In addition, since these costs vary per DDS, we cannot accurately speculate the percentage of the overall distribution and shipping costs from the overall budget reports from the DDSs.
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. 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 cleared the this ICR in 2023, the burden was 1,245. However, we are currently reporting a burden of 1,197 hours. The increase in burden is due to more respondents completing Form SSA-2519. In addition, we are correcting an inadvertent typo in the burden hours from 2023 from ROCIS where we accidentally added an extra zero (which throws off the numbers in ROCIS, making it look like we had a significant decrease). The number of respondents from 2023 in ROCIS should have read as "5,000," not "50,000. We are correcting this typo here. The updated figures for 2026 represent normal fluctuation in respondents for this information collection and also reflects current Management Information data. SSA made no changes which would affect the burden for this information collection.

*Note: The total burden reflected in ROCIS is **4,867**, while the burden cited in #12 of the Supporting Statement is **1,197**. This discrepancy is because the ROCIS burden reflects the following components: field office waiting time + telephone call system wait times + learning costs + a rough estimate of a 30-minute, one-way, drive burden. 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. <u>Collections of Information Employing Statistical Methods</u>

SSA does not use statistical methods for this information collection.