

**Supporting Statement for Form SSA-704,
Certification of Contents of Document(s) or Record(s)
20 CFR 404.707, 404.715, 404.716, 404.720, 404.721,
404.723, 404.725, 404.727, 404.728, 404.730, 404.731, 404.732,
404.733, 404.735, 404.1370, 404.1371, 408.202 and 408.216
OMB No. 0960-0689**

A. Justification

1. **Introduction/Authoring Laws and Regulations** - *Sections 205(a), 806(a)-(b), 1631(e)(1)(A)-(B), and 1631(f) of the Social Security Act* gives the Commissioner of Social Security the authority to establish procedures for securing evidence necessary for individuals to establish rights to Social Security benefits, including Title VIII, Special Veteran's Benefits, and Supplemental Security Income (SSI) payments. Some of the required evidence categories include evidence of age, relationship, citizenship, marriage, death, and military service. *Title 20 of the Code of Federal Regulations (CFR), Sections 404.707, 404.715, 404.716, 404.720, 404.721, 404.723, 404.725, 404.727, 404.728, 404.730, 404.731, 404.732, 404.733, 404.735, 404.1370, 404.1371, 408.202, and 408.216* describe the information needed to establish age, citizenship, marriage, death, and military service. Form SSA-704 allows state record custodians and other custodians of evidentiary documents to certify and record information from original documents and records under their custodial ownership--information SSA uses in determining an applicant's eligibility for benefits. *Title 20 CFR, Section 404.707*, permits the documentation of evidence from certified copies of original records.
2. **Description of Collection** – SSA uses the information collected from Form SSA-704 to establish proof of age, relationship, citizenship, marriage, death, military service, or to evaluate a family bible or other family record when an individual applying for benefits cannot provide documentation to substantiate their information. SSA sends the form to state record custodians and other custodians of evidentiary documents. At our request, they complete the form, supplying and/or verifying a benefits applicant's information against the original documents or records under their purview. We use this form in situations where the applicant cannot produce the evidentiary documentation required to establish benefits eligibility.
3. **Use of Information Technology to Collect Information** - SSA did not create an electronic version of the SSA-704 under the agency's Government Paperwork Elimination Act (GPEA) plan because of the low-volume use. In addition, this form is an agency-initiated form that we send to respondents only when necessary (i.e., when a benefits applicant cannot produce the required documentation to support their claim).
4. **Why We Cannot Use Duplicate Information** - The nature of the information SSA is collecting and the manner in which we are collecting 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 SSA did not collect this information or collected it less frequently, we could not establish an individual's eligibility to, or correct amount of, their Social Security benefits. There are no technical or legal obstacles that prevent burden reduction.
7. **Special Circumstances** - There are no special circumstances that would cause SSA to collect this information in a manner inconsistent with 5 *CFR* 1320.5.
8. **Solicitation of Public Comment and Other Consultations with the Public** – SSA published the 60-day advance Federal Register notice on January 22, 2010, at 75 FR 3778 and SSA has received no public comments. We published the 30-day advance Federal Register Notice on March 30 at 75 FR 15761. If we receive any comments in response to the 30-day Notice, we will forward them to OMB. We have had no outside consultations with members of the public.
9. **Payment or Gift to Respondents** - SSA provides no 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 for Sensitive Questions** - The information collection does not contain any questions of a sensitive nature.
12. **Estimates of Public Reporting Burden** - Approximately 4,800 respondents will use the SSA-704. The average response time is 10 minutes, for a total of 800 burden hours. The total burden reflects burden hours; we did not calculate a separate cost burden.
13. **Annual Cost to Respondents (Other)** - There is no known cost burden to the respondents.
14. **Annual Cost to the Federal Government** - The annual cost to the Federal Government is approximately \$12,936. This estimate is a projection of the costs for printing and distributing the collection instrument and for collecting the information.
15. **Program Changes or Adjustments to the Information Collection Request** - There are no changes in the public reporting 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 requirements 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 did not use statistical methods for this information collection.