

**SUPPORTING STATEMENT FOR FORMS SSA-512 AND SSA-513
REQUEST TO RESOLVE QUESTIONABLE QUARTERS OF COVERAGE (QC);
REQUEST FOR QC HISTORY BASED ON RELATIONSHIP**

OMB No. 0960-0575

A. Justification

1. *Section 432 of Public Law 104-193 of the Personal Responsibility and Work Opportunity Reconciliation Act of 1996 (Welfare Reform Act) requires verification of earnings under Social Security by States administering programs that provide a Federal public benefit. Under this law, only certain excepted classes of aliens are eligible for Food Stamps. Each of the 50 States may also restrict eligibility for Medicaid, Temporary Assistance for Needy Families, and programs funded by a social service block grant to those same excepted categories of aliens. One of the exceptions can be met through the use of information in Social Security's records. The exception involves aliens who are lawfully admitted to the United States (U.S.) for permanent residence under the Immigration and Nationality Act and who have worked or can be credited with 40 qualifying quarters of coverage (QC). Under certain conditions, the QC of parents or spouses can be added to the alien's record to achieve the needed 40 QC.*

2. In cases where a consent form has been obtained from the wage earner, QC data can be retrieved electronically from SSA's Quarters of Coverage History System (QCHS). However, if the electronically produced QC history is found to have questionable entries, the form SSA-512 will be used by the States as a cover form to return the questionable history and to request clarification and resolution of the issues from SSA. In cases where a consent form has not been signed, QC data cannot be retrieved electronically from QCHS because of privacy issues. In such cases, SSA must manually retrieve only the QC history in order to prevent the release of other personal data from the record. The form SSA-513 provides the States with a standardized request form to obtain information needed from SSA in order to determine eligibility for state benefits.

SSA needs the information collected on Form SSA-512 to facilitate the process of investigating the earnings, to either confirm or deny the questionable QC. The information collected on Form SSA-513 is needed by SSA to facilitate the manual retrieval of only the QC history from SSA's files.

3. SSA developed the QCHS to facilitate the electronic retrieval of information. Paper forms will be used only in the situations described in Item 2 above.

4. The nature of the information being collected and the manner in which it is collected preclude duplication. There is no other form used by SSA that collects data similar to that collected by forms SSA-512 and SSA-513.

5. The collection of this information does not involve small businesses or other small entities.
6. This collection takes place at the discretion of the respondents when they need information from SSA. Without the data, the respondents might make incorrect determinations concerning exceptions to the alien non-eligibility provisions of the Welfare Reform Act. The consequence of not collecting this information would be to make it very difficult for SSA to locate the QC history of the wage earner and conduct investigations. There are no technical or legal obstacles that prevent burden reduction.
7. There are no special circumstances that would cause this information collection to be conducted in a manner inconsistent with 5 CFR 1320.5.
8. The first Federal Register Notice was published on December 15, 2006, at 71 FR 75607. The second Notice was published on February 20, 2007 at 72 FR 7809. We have received no comments from the public as a result of these notices.
9. SSA provides no payment or gifts to the respondents.
10. The information requested in this form is protected and held confidential in accordance with 42 U.S.C. 1306, 20 CFR 401 and 402, 5 U.S.C. 552 (FOIA), 5 U.S.C. 552a (Privacy Act of 1974), and OMB Circular No. A-130.
11. The information collection does not contain any questions of a sensitive nature.
12. Form SSA-512 will be used by approximately 200,000 respondents. The estimated average response time is 2 minutes, for a total of 6,667 burden hours. Form SSA-513 will be used by approximately 350,000 respondents. The estimated average response time is 2 minutes, for a total of 11,667 burden hours. The total number of both forms is 550,000. The total estimated annual burden is 18,334 hours. The total burden is reflected as burden hours and no separate cost burden has been calculated.¹
13. There is no known cost burden to the respondents.
14. The annual cost to the Federal Government is approximately \$465,850.
15. There have been no program changes or adjustments in this form, and there is no change in the public reporting burden.
16. The results of the information collection will not be published.
17. OMB has granted SSA an exemption from the requirement that the OMB expiration date for OMB approval be printed on its program forms. SSA produces millions of public-use

¹ Please note that ROCIS assigned the entire burden for the current use of the form to the SSA-512. In this clearance we have two IC's and assigned burden to each of the forms. Therefore, ROCIS shows a decrease in the burden for the SSA-512 when in fact there is no change in the burden. Likewise, the SSA-513 has no current burden assigned to it and shows the burden as an increase. There is no change in the burden since these forms were last cleared by OMB.

forms, many of which have a life cycle longer than that of an OMB clearance. SSA does not periodically revise and reprint its public-use forms (e.g., on an annual basis). This exemption was granted so that otherwise useable editions of forms would not be taken out of circulation because the expiration date had been reached. In addition, government waste has been avoided because stocks of forms will not have to be destroyed and reprinted.

18. SSA is not requesting an exception to the certification requirements.

B. Collections of Information Employing Statistical Methods

Statistical methods are not used for this information collection.