Supporting Statement for SSA-7004 Request for Social Security Statement 20 CFR 404.810 OMB No. 0960-0466

A. <u>Justification</u>

- 1. Section 205(c)(2)(A) of the Social Security Act (the Act) requires that the Commissioner of Social Security establish and maintain records of wages paid to, and amounts of self-employment income derived by, each individual as well as the periods in which such wages were paid and such income derived. Also, upon request, the Commissioner shall inform any individual or his survivor of the periods during which such wages were paid and such income was derived. Section 1143(a)(2) of the Act requires that the Commissioner "...shall provide upon the request of an eligible individual a Social Security account Statement (hereinafter referred to as the "Statement")." 20 CFR 404.810 of the Code of Federal Regulations provides that an individual may obtain a Statement of earnings or quarters of coverage, as shown in the Social Security Administration records, by making a written request. Form SSA-7004 has been established by SSA to fulfill the "written request" requirement.
- 2. One of SSA's major initiatives is to help the public better understand the Social Security programs. The Social Security Statement is a major tool in this educational effort. The Statement is issued automatically each year to workers age 25 and older who are not yet receiving benefits. Workers also can request a Statement at any time. For requested Statements, SSA uses information provided by the worker on Form SSA-7004 to identify his or her Social Security earnings record, extract the recorded earnings history, calculate estimates of potential benefits, and produce and mail the resulting Statement. The information provided on the Statement includes:
 - Complete earnings information to assure workers that their Social Security records are accurate;
 - Realistic estimates of future retirement benefits that consider the individual worker's anticipated future earnings and expected retirement age; and
 - Estimates of potential disability and survivor benefits for the workers and their families.
- 3. The public can request a Social Security Statement by submitting the paper Form SSA-7004, which this clearance package addresses. Workers complete and mail this form to SSA's Wilkes-Barre, Pennsylvania Data Operations Center for processing. Requests also can be transmitted to SSA electronically via the Internet from SSA's website at http://www.socialsecurity.gov (64.4 percent of the requests received during FY 2006 were submitted online). When requests are received by either method, SSA uses the information on the form to prepare, print and mail the Statement to the requester.

- 4. The nature of the information being requested, and the manner in which it is collected, preclude duplication. SSA uses no other form that collects data similar to the data collected on Form SSA-7004.
- 5. The collection of information does not involve small businesses or other small entities.
- 6. A consequence of not collecting this information would be that the individual would be unable to exercise his or her statutory right to submit (in writing) a request for a copy of his or her earnings or credits (also known as quarters of coverage) as shown on SSA records. Therefore, this information collection could not be conducted less frequently. There are no technical or legal obstacles to 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. Workers are not required to request Statements; however, there are no prohibitions against their doing so more often than quarterly if they so choose. For example, for financial planning, they may want to get Statements using different assumptions as to future earnings amounts or ages at which they will stop working. They merely submit a separate request form for each Statement.
- 8. The 60-day advance Federal Register Notice was published on March 29, 2007 at 72 FR 14845, and SSA has received no public comments. The second Notice was published on June 27, 2007, at 72 FR 35293. There have been no outside consultations with members of the public.
- 9. SSA provides no payment or gifts to the respondents.
- 10. The information provided on 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 (Freedom of Information Act), 5 U.S.C. 552a (Privacy Act of 1074) and OMB Circular No. A-130. Requests transmitted electronically are encrypted using the Secure Socket Layer Security Protocol, an industry standard protocol used by banks and other financial institutions for Internet transactions.
- 11. This information collection does not contain any questions of a sensitive nature.
- 12. We expect Form SSA-7004 to be used by about 545,000 respondents annually. The average time for a respondent to complete a request form is 5 minutes or an estimated 45,417 burden hours. In FY 2006, there were approximately 194,000 paper and 351,668 electronic SSA-7004's submitted by individuals. The total burden is reflected as burden hours, and no separate cost burden has been calculated.
- 13. There is no known cost burden to the respondents.

- 14. The estimated cost to the federal government is approximately \$175,520.94. This estimate is for printing, distribution and collecting the information. This estimate is less than previous years. The reduction is due to several factors, such as more accurate reporting methods to track the number of requests, an increase in computer literacy and the growing number of automatic yearly Statements. Costs for handling those Statement requests received through the Internet (about 64.4 percent of the total) are negligible.
- 15. There has been an adjustment in the public reporting burden. This usage estimate volume is considerably lower than the report issued on December 10, 2003 as we now have a more accurate number of respondents for this collection. The number of automatic annual Statements is constantly increasing. Further, more people are using the automatic online benefit calculators to estimate their potential benefits.

Also, we have split the burden between two ICs in order to show the separate burdens for the paper and Internet versions of the form.

- 16. The results of this information collection will not be published.
- 17. OMB has granted SSA an exemption from the requirement that the expiration date for OMB approval be printed on its program forms. SSA produces millions of public-use 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 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 need to be destroyed and reprinted.
- *18.* SSA is not requesting an exception to the certification requirements. Statistical survey methodology is not used for this information collection.

B. <u>Collections of Information Employing Statistical Methods</u>

Statistical methods are not used for this information collection.