

**Supporting Statement for Form SSA-L3231-C1  
Employer Verification of Records for Children Under Age 7  
20 CFR 404.801-404.803, 404.821-404.822  
OMB No. 0960-0505**

**A. Justification**

1. *Section 205(a) of the Social Security Act (the Act) provides the Commissioner of Social Security with power and authority to make the rules, regulations, and procedures necessary to carry out provisions of the Act. Section 205(c)(2)(A) of the Act charges the Commissioner with establishing and maintaining records of the amounts of wages paid and the amounts of self-employment income derived by individuals. Sections 20 CFR 404.801-404.802 of the Code of Federal Regulations establish the procedures for implementing the latter section of the Act. 20 CFR 404.803 explains that the amount of earnings credited to an individual, and the periods to which such earnings are credited, may be proved by the records of the Social Security Administration (SSA) and by other evidence of probative value. Sections 20 CFR 404.821-404.822 sets forth the procedures for the Commissioner to investigate and correct earnings reported if there is evidence that the earnings reported are incorrect or are reported for the wrong person or period. Under the aegis of these statutes, form SSA-L3231-C1 is used to verify that income reported to SSA for workers under the age of seven was actually earned by the worker.*
2. SSA has discovered that as many as 70% of the wage reports it receives for children under age seven are actually the earnings of someone other than the child. Accordingly, SSA decided that wage reports for children under age seven should be verified before being posted to the earnings record. Form SSA-L3231-C1 is used to collect this information from the child's employer. The employer is asked to complete the printed form and to provide information that will be used to identify the worker and to ensure that the proper person is credited with the reported earnings.
3. Due to the low volume of usage and the Agency's limited resources, SSA-L3231-C1 is not currently scheduled for electronic implementation.
4. The nature of the information being collected and the manner in which it is collected preclude duplication. There is no other collection instrument used by SSA that collects data similar to that collected here.
5. Small businesses may be affected by this form if they report earnings for a child under age seven. However, since this is a brief form and a small business is likely to have very few such workers, the impact of this form on small businesses is relatively insignificant. Additionally, we provide as

much identifying information from our records as possible in order to minimize the burden on the employers completing this form.

6. If form SSA-L3231-C1 were not used, SSA would have no way of determining if the wages reported for a child under age seven were truly earned by that child, or if they were actually earned by another worker. If SSA could not make this determination, the Agency might improperly post wages to the earnings records of persons who have not worked for the wages. As a result, incorrect entitlement to Social Security benefits could occur. In addition, the workers who actually earned these wages will not receive proper credit for them, and their future Social Security benefits may be incorrect or incorrectly denied. This information is only collected on occasion, so it could not be collected less frequently. 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 that is not consistent with 5 CFR 1320.5
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 13, 2007, at 72 FR 32697. There have been no outside consultations with members of the public.
9. SSA provides no payment or gifts to the respondents.
10. The information requested 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 US.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. An estimated 20,000 respondents will spend 10 minutes each to complete forms SSA-L3231-C1. Therefore the total burden is 3,333 hours. The total burden is reflected as burden hours, and no separate cost burden has been calculated. It is not possible to determine the type of respondents as SSA has no means of identifying the type of respondent.
13. There is no known cost burden to the respondents.
14. The annual cost to the Federal Government is approximately \$30,800. This estimate is a projection of the costs for printing and distributing the collection instruments and for collecting information.

15. There are no changes 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 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 the 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 at 5 CFR 1320.9 and related provisions at 5 CFR 1320.8(b)(3).

**B. Collection of Information Employing Statistical Methods**

Statistical methods are not used for this information collection.