

**SUPPORTING STATEMENT FOR FORM SSA-671
RAILROAD EMPLOYMENT QUESTIONNAIRE**

20 CFR 404.1401, 404.1406-.1408

OMB No. 0960-0078

A. Justification

1. The Social Security Administration (SSA) works with the Railroad Retirement System to provide a coordinated system of retirement, survivors', dependents, and disability benefits to railroad workers, their dependents, and survivors. Section 205(i) of the *Social Security Act* allocates benefits payments to certain railroad workers and their dependents/survivors. Section 205(o) of the Act allows Social Security credit for certain railroad employees. Section 20 CFR 404.1401 of the *Code of Federal Regulations (CFR)* describes the manner in which Social Security benefits integrate with the Railroad Retirement System. Sections 20 CFR 404.1406-.1408 of the CFR detail the circumstances under which Social Security benefits can be paid to a railroad employee, and when railroad industry employment can be considered wages for Social Security purposes.

SSA needs a specialized information collection tool that will enable the Agency to coordinate benefits distribution with the Railroad Retirement Board (RRB). Form SSA-671, the Railroad Employment Questionnaire, serves this purpose.

2. SSA uses the information it collects on form SSA-671 to coordinate Social Security claims processing with the RRB. Railroad workers or their dependents/survivors complete the form and submit it to SSA. Using this information, the Agency can work with the RRB to determine exactly which benefits and the amount of benefits SSA should pay.
3. In 98% of cases, SSA collects this information electronically in its field offices using the employee-completed MCS screens. Currently, we do not have an Internet version of this form under the Agency's Government Paperwork Elimination Act plan because the nature of the information collection (i.e. coordination with the RRB) is more easily accomplished with a paper-based or office interview form.
4. The nature of the information we are collecting and the manner in which we are collecting it preclude duplication. SSA does not use any other collection instrument to collect similar data.
5. This collection does not affect small businesses or other small entities.

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6. If SSA did not collect this information, we would have no means of coordinating benefits for railroad workers and their dependents/survivors, which would be a violation of the relevant laws and regulations. Since we only collect the information when it is necessary (i.e. when railroad workers or their dependents/survivors apply for benefits), we cannot collect it less frequently.

There are no technical or legal obstacles to burden reduction.

7. There are no special circumstances that would cause SSA to collect this information in a manner inconsistent with 5 CFR 1320.5.
8. SSA published the 60-day Advance Federal Register Notice on March 26, 2008 at 73 FR 16087, and we did not receive any public comments. We published the 30-day Federal Register Notice on May 28, 2008 at 73 FR 30656. If we receive any public comments in response to the 30-day Notice, we will forward them to OMB.

SSA did not consult members of the public in the development or maintenance of this form.

9. SSA provides no payment or gifts to the respondents (except for Social Security benefits, if applicable).
10. We protect and hold confidential the information we request in this form 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. The information collection does not contain any questions of a sensitive nature.
12. Approximately 125,000 respondents take 5 minutes each (same for paper/MCS versions) to complete form SSA-671 annually. The total burden of 10,417 hours is reflected as burden hours, and we did not calculate a separate burden cost.
13. There is no known cost burden to the respondents.
14. The annual cost to the Federal Government for this collection is \$192,500. This estimate is a projection of the costs for printing and distributing the form and for collecting/processing the information.
15. There are no changes to the public reporting burden.
16. SSA will not publish the results of the information collection.
17. OMB 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 approval. 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, we avoid Government waste because we will not have to destroy and reprint stocks of forms.

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. Collections of Information Employing Statistical Methods

SSA does not use statistical methods for this information collection.