

Supporting Statement for Form SSA-7008
Request for Correction of Earnings Record
20 CFR 404.820 and 20 CFR 422.125
OMB No. 0960-0029

A. Justification

- 1. Introduction/Authoring Laws and Regulations** - *Sections 205(c) (4)-(5) of the Social Security Act* state the Commissioner of the Social Security Administration (SSA) may correct or amend the earnings records of individuals if necessary. *Sections 20 CFR 404.820 and 20 CFR 422.125 of the Code of Federal Regulations* establish the procedures and policies for correcting individuals' earnings records. SSA uses Form SSA-7008 to collect the information necessary to carry out these procedures.
- 2. Description of Collection** - When individuals request a correction of their earnings record, SSA must verify the record against all other data previously received for those individuals. SSA uses Form SSA-7008 to collect the information necessary to conduct the verification. The respondents are individuals who request correction of earnings posted to their Social Security earnings record.
- 3. Use of Information Technology to Collect the Information** - SSA has implemented an electronic system (Earnings Modernization Item Correction – ICOR) that permits SSA to take the majority of requests for correction of an individual's earnings record via the telephone or through a personal interview entering the data directly into the system. Only in cases where the individual is not in the local SSA field office for direct questioning or telephones the SSA National 800 number or field office directly, do we mail the paper Form SSA-7008 to the individual for completion. We estimate 90 percent of the information is collected using ICOR.
- 4. Why We Cannot Use Duplicate Information** - The nature of the information we are 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. Consequences of Not conducting Information or Collecting it Less Frequently** - If SSA did not collect the information, we would have no means of verifying an individual's earnings record when the veracity of SSA's records are in question. Thus, SSA could potentially have inaccurate earnings records for a worker, which could lead to the worker receiving improper Social Security benefits (overpayment or underpayment) at the end of the

worker’s career. Since we collect the information from individuals who complete Form SSA-7008 only when they have questions regarding SSA’s records, we cannot collect it less frequently. 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 that is not consistent 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 August 2, 2010 at 75 FR 45190, and we received no public comments. SSA published the 30-day advance Federal Register Notice on October 5, 2010 at 75 FR 61550. If we receive any comments in response to the 30-day Notice, we will forward them to OMB. We did not consult with members of the public.
9. **Payment or Gifts to the Respondents** - SSA provides no payment or gifts to the respondents.
10. **Assurances of Confidentiality** – SSA protects and holds confidential the information we collect 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 Questions of a Sensitive Nature** - The information collection does not contain any questions of a sensitive nature.
12. **Estimates of Public Reporting Burden** - Approximately 375,000 respondents use form SSA-7008 annually. The average estimated completion time is 10 minutes. This results in an annual estimated burden of 62,500 hours. Approximately 37,500 respondents will use the paper version of the form and 337,500 respondents will complete the form via an SSA conducted telephone or in-person interview, where we enter the data directly into the ICOR Earnings Modernization System as seen on the chart below. The total burden reflects burden hours, and we did not calculate a separate cost burden.

	Number of Respondents	Frequency of Response	Estimated Burden per Response (minutes)	Estimated Annual Burden (hours)
Paper Version	37,500	1	10	6,250
ICOR	337,500	1	10	56,250
Total	375,000	-	-	62,500

- 13. Annual cost to the Respondents** - There is no known cost burden to the respondents.
- 14. Cost to the Federal Government** – The annual cost to the Federal Government is approximately \$5,150. This estimate is a projection of the cost for printing and distributing the collection instrument and for collecting the information.
- 15. Changes to the Public Reporting Burden** - There is no change in public reporting burden.
- 16. Publication of the Results of the Information Collection** – SSA will not publish the results of the information collection.
- 17. OMB Certification Requirements** - OMB granted SSA an exemption from the requirement 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. OMB Certification Requirements** - 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 will not use statistical methods for this information collection.