

Supporting Statement for Form SSA-4156
Employee Identification Statement
20 CFR 404.702
OMB No. 0960-0473

A. Justification

1. Introduction/Authoring Laws and Regulations

Section 205 (c)(2)(A) of the *Social Security Act* and 20 CFR 404.702 of the *Code of Federal Regulations* require the Social Security Administration (SSA) to establish and maintain records of the wages and the self-employment income of individuals. Whenever earnings are reported under a Social Security Number (SSN) that does not belong to a worker, SSA must identify the worker, determine the correct SSN to which the earnings should be posted, and remove the earnings from the incorrect Social Security record.

2. Description of Collection

When two or more individuals report earnings under the same SSN, SSA collects information on the SSA-4156 to credit earnings to the correct individual and the correct SSN. We send this form to the employer to identify the employees involved, to resolve the discrepancy, and to post earnings to the correct SSN. The respondents are employers involved in erroneous wage information reporting for an employee.

3. Use of Information Technology to Collect the Information

SSA did not create an electronic version of the SSA-4156 under the agency's Government Paperwork Elimination Act (GPEA) plan because only 4,750 respondents complete the form annually. This is less than the GPEA cut-off of 50,000. However, we send the form with pre-filled information for response and return to lessen the burden on the public.

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 significantly affect small businesses or other small entities.

6. Consequence of Not Collecting Information or Collecting it Less Frequently

If SSA did not collect this information, we would be unable to resolve discrepancies when two or more individuals report earnings under the same SSN. We only collect this information when necessary on an individual basis to resolve

erroneously posted earnings. Therefore, 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 conduct this information collection in a manner inconsistent with *5 CFR 1320.5*.

8. Solicitation of Public Comment and Other Consultations with the Public

The 60-day advance Federal Register Notice published on September 27, 2010 at 75 FR 59318, and SSA received no public comments. The 30-day Notice published on December 22, 2010 at 75 FR 80563. If we receive any 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. Payment or Gifts to Respondents

SSA does not provide payments or gifts to the respondents.

10. Assurances of Confidentiality

SSA protects and holds confidential the information it collects 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 Sensitive Questions

Item 6 of Form SSA-4156 asks for a physical description of the employee, which we only use to assist with identification. In these situations, SSA knows at least one worker is using another worker's name or SSN. When SSA is unable to contact the persons involved, we need physical descriptions to distinguish between the SSN holder and the employee who is using the incorrect SSN. If SSA is able to contact one of the individuals involved, we use the information for identification purposes only.

12. Estimates of Public Reporting Burden

Approximately 4,750 respondents take 10 minutes each to complete the SSA-4156 annually. Accordingly, the burden is 792 hours. This figure represents burden hours, and we did not calculate a separate cost burden.

13. Annual Cost to the Respondents (Other)

This collection does not impose a known cost burden on the respondents.

14. Annual Cost To Federal Government

The annual cost to the Federal Government is approximately \$7,315. This estimate is a projection of the costs for printing and distributing the collection instrument, and for collecting the information.

15. Program Changes or Adjustments to the Information Collection Request

There are no changes to the public reporting burden.

16. Plans for Publication Information Collection Results

SSA will not publish the results of the information collection.

17. Displaying the OMB Approval Expiration Date

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. Exceptions to Certification Statement

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.