

**Supporting Statement for Form SSA-671
Railroad Employment Questionnaire
20 CFR 404.1401, 404.1406-1408**

OMB No. 0960-0078

A. Justification

1. Introduction/Authoring Laws and Regulations

The Social Security Administration (SSA) needs specific information to coordinate benefit distribution with the Railroad Retirement Board (RRB). The *Social Security Act (Act)*, section 205(o) provides criteria for use of railroad compensation to determine Social Security benefit entitlement. The *Code of Federal Regulations*, section 20 CFR 404.1401 describes the relationship between the Act and the Railroad Retirement Act, and the coordination of benefits provided to railroad workers, their dependents, and survivors. 20 CFR 404.1406-1408 describe the circumstances under which SSA may pay Social Security benefits to a railroad employee, and when railroad industry employment can be considered wages for Social Security purposes. SSA uses Form SSA-671, the Railroad Employment Questionnaire, to collect the information to complete this process.

2. Description of Collection

Railroad workers, their dependents, or survivors can concurrently apply for railroad retirement and Social Security benefits at SSA whenever the Social Security Number (SSN) holder or claimant associated with the number holder's SSN (spouse or dependant) worked in the railroad industry. SSA uses the information to coordinate Social Security claims processing with the Railroad Retirement Board, and to determine benefit entitlement and amount. Respondents are Social Security benefit applicants employed by a railroad or are dependents of railroad workers.

3. Use of Information Technology to Collect the Information

SSA employees using the modernized claims system or the Modernized Supplemental Security Income Claims System collect 98 percent of respondent information during field office interviews. A print-only PDF version of this form is available on SSA's website for completion and mailing.

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. Consequence of Not Collecting Information or Collecting it Less Frequently**
If SSA did not collect this information, we would have no means of coordinating benefits for railroad workers and their dependents. Failure to coordinate SSA and RRB benefits could result in duplicate or incorrect annuity payments, and violate relevant laws and regulations. Since we only collect the information when it is necessary, (i.e. when railroad workers or their dependents or survivors apply for benefits), we cannot collect it less frequently.

There are no technical or legal obstacles to 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**
SSA published the 60-day advance Federal Register Notice on March 3, 2011, at 76 FR 11835, and we received no public comments. We published the 30-day Notice on May 16, 2011 at 76 FR 28297. 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 in the 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**
The information collection does not contain any questions of a sensitive nature.
- 12. Estimates of Public Reporting Burden**
Approximately 125,000 respondents take 5 minutes each to complete Form SSA-671 each year. Accordingly, the burden is 10,417 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 \$192,500. This estimate is a projection of the costs for printing and distributing the collection instrument and for processing the information collected.

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

For the paper form SSA-671, we will not publish 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.

For the Internet version (PDF) of form SSA-671, SSA is not requesting an exception to the requirement to display the OMB approval expiration date.

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.