

**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). *Section 205(o)* of the *Social Security Act* (the *Act*) provides the criteria for use of railroad compensation to determine Social Security benefit entitlement. *Section 20 CFR 404.1401* of the *Code of Federal Regulations* describes the relationship between the *Act* and the Railroad Retirement Act, and the coordination of benefits provided to railroad workers, their dependents, and survivors. *Section 20 CFR 404.1406-1408* of the *Code of Federal Regulations* describes 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.

2. Description of Collection

Railroad workers, their dependents, or survivors can concurrently apply for railroad retirement and Social Security benefits at SSA if the number holder, or claimant on the number holder's Social Security number, worked in the railroad industry. SSA uses the SSA-671 to coordinate Social Security claims processing with the Railroad Retirement Board and to determine benefit entitlement and amount. The respondents are Social Security benefit applicants previously employed by a railroad or 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. Form SSA-671 is available electronically on SSA's website in a portable document format (PDF) for completion and mailing.

SSA did not create an electronic version of Form SSA-671 under the agency's Government Paperwork Elimination Act as other forms used by greater number of respondents took precedence.

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 we did not use Form SSA-671, 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. Because we only collect the information on an as needed basis, 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

The 60-day advance Federal Register Notice published on April 22, 2014, at 79 FR 22569, and we received no public comments. The 30-day FRN published on July 02, 2014 at 79 FR 37828. If we receive any comments in response to this Notice, we will forward them to OMB.

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

Modality of Completion	Number of Respondents	Frequency of Response	Average Burden Per Response (minutes)	Estimated Total Annual Burden (hours)
SSA-671	125,000	1	5	10,417

The total burden for this ICR 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 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

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.