

Supporting Statement for Forms SS-5, SS-5-FS
Application for a Social Security Number Card, and the Social Security Number
Application Process (SSNAP)
20 CFR 422.103 - 422.110
OMB No. 0960-0066

A. Justification

1. Introduction/Authoring Laws and Regulations

Section 205(c)(2)(B) of the *Social Security Act* and sections 20 *CFR* 422.103-422.110 of the *Code of Federal Regulations* (CFR) authorize the Social Security Administration (SSA) to assign Social Security numbers (SSNs) and issue SSN cards for those numbers. Section 20 *CFR* 422.107 discusses the evidentiary and interview requirements for obtaining an SSN. 20 *CFR* 422.103 specifies that an individual may apply for a new or replacement SSN by completing a Social Security Administration (SSA)-approved application designed for this purpose. Section 20 *CFR* 422.103(e)(2) places annual and lifetime limits on the number of replacement SSN cards SSN holders may receive (no more than three in a year and 10 per lifetime).

2. Description of Collection

SSA collects information on the SS-5 (used in the United States) and SS-5-FS (used outside the United States) to issue original or replacement Social Security cards. SSA also enters the application data into SSNAP when applicants request a new or replacement card either via telephone or in person. Applicants who visit an FO can complete their application in an interview situation without completing a paper Form SS-5 or SS-5-FS. As per section 20 *CFR* 422.110, members of the public may also file one of these applications to request a change in their SSN records. In addition, hospitals collect the same information for SSA about newborn children through the Enumeration-at-Birth (EAB) process. In this process, parents of newborns provide hospital birth-registration clerks with information required to register the newborns. Hospitals send this information to State Bureaus of Vital Statistics (BVSs), and the BVSs send the information to SSA's National Computer Center. SSA then uploads the data to the SSA mainframe along with all other enumeration data, and we assign the newborn a Social Security Number and issue a Social Security card. The respondents are applicants for original and replacement Social Security cards.

3. Use of Information Technology to Collect the Information

SSA does not currently maintain an Internet version of this form. However, applicants can avoid completing a paper Form SS-5 by visiting an FO and providing their information during a personal interview while an SSA employee enters the information into the electronic SSNAP system. We estimate approximately 90 percent of applicants visit an SSA field office to file their application using SSNAP, while

only approximately 10 percent complete the paper versions of the forms and mail them to an office for processing.

4. Why We Cannot Use Duplicate Information

The nature of the information we are collecting and the manner in which we collect 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 conduct this information collection, the public would have no way to apply for SSNs and SSN replacement cards. Since the public needs SSNs to maintain earnings records, apply for jobs, file tax returns, open accounts at financial institutions, etc., not having an SSN or SSN card would be a great disadvantage. Since we only collect the information when an applicant needs an original or replacement SSN card, 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 collect this information 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 August 28, 2014, at 79 FR 51387, and we received no public comments. SSA published the second Notice on November 3, 2014, at 79 FR 65282. If we receive comments in response to the 30-day Notice, we will forward them to OMB. We did not consult with the public in the revision of this form.

9. Payment or Gifts to Respondents

SSA provides no payment 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

Below are annual burden data for the different types of SSNAP/SS-5/SS-5-FS/EAB applicants. Since the questions are identical (only the instructions are different), we combined the burden data for all application scenarios. Each of the below categories includes both the paper and electronic versions of this collection with the exception of the cover letters, because we only maintain paper versions of the cover letters. As we stated in #3 above, approximately 90 percent of all respondents use the electronic SSNAP system rather than using the paper versions of the form; however, it takes the same amount of time to fill out the paper versions as it does for the SSNAP system interview process.

Application Scenario	Number of Respondents	Frequency of Response	Average Burden Per Response (minutes)	Estimated Total Annual Burden (hours)
Respondents who do not have to provide parents' SSNs	12,000,000	1	8.5	1,700,000
Respondents whom we ask to provide parents' SSNs (when applying for original SSN cards for children under age 18)	400,000	1	9	60,000
Applicants age 12 or older who need to answer additional questions so SSA can determine whether we previously assigned an SSN	1,500,000	1	9.5	237,500
Applicants asking for a replacement SSN card beyond the new allowable limits (i.e., who must provide additional documentation to	900	1	60	900

accompany the application)				
Authorization to SSA to obtain personal information cover letter	500	1	15	125
Authorization to SSA to obtain personal information follow-up cover letter	500	1	15	125
Totals	13,901,900			1,998,650

The total annual burden is **1,998,650** hours. We calculated a separate cost burden for State BVSs only for the EAB process (see next question).

13. Annual Cost to the Respondents (Other)

Under the Enumeration at Birth (EAB) process, the State BVSs incur costs for participating in EAB. The State BVSs incur a total cost of approximately \$9.8 million for transmitting data to SSA's mainframe. Please note the States receive reimbursement for these costs.

14. Annual Cost To Federal Government

The annual cost to the Federal Government for these collections is approximately \$388 million. This cost is an estimate of the SSN issuance process, including printing and distribution costs, the costs of processing the forms, and the cost to complete the applications. This also includes the reimbursement for the EAB process.

15. Program Changes or Adjustments to the Information Collection Request

The increase in the burden is due to the fluctuation in the number of annual respondents. SSA bases our estimates on systematic data, and we estimate the numbers accordingly. The increase in the cost burden estimate is due to fluctuations in costs, and inflation rates.

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.