

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(a), 205(c)(4)-(5), and 233 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

Individuals alleging their earnings records in SSA's files are inaccurate use Form SSA-7008 to provide the information SSA needs to check earnings posted, and as necessary, initiate development to resolve any inaccuracies. SSA uses an electronic system (see #3 below) which allows SSA to take the majority of requests for correction of an individual's earnings record via a personal or telephone interview and enter 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. The respondents are individuals who request correction of earnings posted to their Social Security earning records.

3. Use of Information Technology to Collect the Information

In accordance with the agency's Government Paperwork Elimination Act plan, SSA created an Intranet version of Form SSA-7008, the Earnings Modernization Item Correction – ICOR system. Based on our data, we estimate approximately 90% of respondents under this OMB number use the electronic version.

4. Why We Cannot Use Duplicate Information

The nature of the information we collect 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. Consequences of Not conducting Information or Collecting it Less Frequently

If we did not use Form SSA-7008, we would have no means of verifying an

individual's earnings record when the accuracy of SSA's records is in question. Thus, SSA could potentially have inaccurate earnings records for a worker, which could lead to the worker receiving improper Social Security benefits (underpayment or overpayment) at the end of the worker's career. Because we 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 Circumstance

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 September 16, 2016 at 81 FR 63837, and we received no public comments. SSA published the second Notice on November 17, 2016, at 81 FR 81224. 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 the Respondents

SSA does not provide 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 Sensitive Questions

The information collection does not contain any questions of a sensitive nature.

12. Estimates of Public Reporting Burden

Approximately 375,000 respondents take 10 minutes each to complete Form SSA-7008 each year, either via the electronic or paper versions (see chart below):

Modality of Completion	Number of Respondents	Frequency of Response	Average Burden Per Response (minutes)	Estimated Total Annual Burden (hours)
Paper form	37,500	1	10	6,250
In-person or telephone interview	337,500	1	10	56,250
Total	375,000			62,500

The total burden for this ICR is **62,500** hours. This figure represents burden hours, and we did not calculate a separate cost burden.

13. Annual cost to the Respondents

This collection does not impose a known cost burden on 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 are no changes to the public reporting burden.

16. Plans for 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 will not use statistical methods for this information collection.