

**Supporting Statement for Form SSA-671
Railroad Employment Questionnaire
20 CFR 404.1401, 404.1406-404.1408
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 (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 404.1406-404.1408 of the *Code of Federal Regulations* describes the circumstances under which SSA may pay Social Security benefits to a railroad employee, and when SSA can consider railroad industry wages for our own 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 RRB, 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

In accordance with the agency's Government Paperwork Elimination Act plan, SSA created an electronic version of Form SSA-671. Based on our data, we estimate approximately 98% of respondents under this OMB number use the electronic version. SSA collects answers to the SSA-671 interviews through our Modernized Claims System (MCS) or Modernized Supplemental Security Income Claims System (MSSICS).

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. 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 collect this 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 March 10, 2017, at 82 FR 13372, and we received no public comments. The 30-day FRN published on May 23, 2017 at 82 FR 23695. 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.