

**Supporting Statement for the  
Social Security Number Verification Services  
20 CFR 401.45  
OMB No. 0960-0660**

**A. Justification**

**1. Introduction/Authoring Laws and Regulations**

Internal Revenue Service (IRS) regulations at *26 CFR 31.6051* of the *Code of Federal Regulations* require employers to provide wage and tax statements to employees and the Social Security Administration (SSA). Under IRS regulations, employers are obligated to provide wage and tax data to the Social Security Administration using Form W-2, or its electronic equivalent. As part of this process, the employer must furnish the employee's name and their Social Security Number (SSN). To record the information to the earnings record, the employee's name and SSN must match SSA's records.

SSA collects the SSN verification information in accordance with *5 USC 552a (e) (10)* of the Privacy Act of 1974, which requires agencies to establish appropriate administrative, technical, and physical safeguards to ensure the security and confidentiality of records. Also, *5 USC 552a (f)(2)&(3)* requires agencies to establish requirements for identifying an individual who requests a record or information pertaining to that individual, and to establish procedures for disclosure of personal information. SSA promulgated Privacy Act rules in the *Code of Federal Regulations, Subpart B*. Procedures for verifying identity are in *20 CFR 401.45*.

**2. Description of Collection**

Currently, SSA receives over 2 million IRS Corrected Wage and Tax Statement forms, Form W-2Cs (OMB # 1545-0008), that we use to correct problems with original IRS Wage and Tax Statement forms, Form W-2 (OMB # 1545-0008). Many of these W-2Cs deal with invalid name and SSN combinations. We believe most of these W-2Cs are a direct result of information available to employers through SSA's Electronic Wage Reporting process, which allows employers to file wage reports with SSA in a timely and accurate manner. As one of its functions, the Electronic Wage Reporting process informs employers of the names and numbers they reported to SSA that do not match SSA's records.

SSA offers the Social Security Number Verification Systems (SSNVS), which allows employers to verify that the reported names and SSNs of their employees match SSA's records. SSNVS is a cost-free, voluntary method for employers to verify employee information via the Internet. SSA annotates data an employer supplies to SSA for verification that does not match SSA's records with a no match indicator and returns it to the employer. SSA retains an audit trail of all supplied data. In addition, SSA uses the data collected as part of its continual evaluation of the SSNVS process. SSA does not use the information provided for any other purposes.

### **Authentication/Registration to use SSN Verification Service**

To use SSNVS, an individual representing an employer or third party must register through SSA's Integrated Registration for Employers and Submitters (IRES), OMB Control number 0960-0626. Once registered, users request the service, but cannot use it until they enter an activation code SSA mails to their employers. This process provides SSA with a positive confirmation the company authorizes the user to perform the verifications for the company. The system uses a User ID and Password to verify the identity of the users, thus allowing them to use SSNVS.

The respondents are employers who need to verify SSN data using SSA's records.

### **3. Use of Information Technology to Collect the Information**

In accordance with the agency's Government Paperwork Elimination Act plan, SSNVS is an electronic, Internet-based service. Based on our data, we estimate 100% 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. Consequence of Not Collecting Information or Collecting it Less Frequently**

Failure to provide the SSNVS service would deny employers the ability to verify employee SSNs, making it more difficult to provide correct W-2 information. In addition, SSNVS is a fast, convenient, and secure service that saves time and effort when preparing and correcting W-2 forms submitted to SSA. Use of this service reduces phone calls for requests for verifications; mailing verification materials; and the need to visit SSA field offices to obtain name and SSN information. Because the service is voluntary, we cannot collect the information 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 February 1, 2018, at 83 FR 4722, and we received no public comments. The 30-day FRN published on May 9, 2018 at 83 FR 21328. 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**

<b>Modality of Completion</b>	<b>Number of Respondents</b>	<b>Frequency of Response</b>	<b>Number of Responses</b>	<b>Average Burden Per Response (minutes)</b>	<b>Total Annual Burden (hours)</b>
SSNVS	41,387	60	2,483,220	5	206,935

The total burden for this ICR is **206,935** hours. We based these figures on current management information data. 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 \$110,300. This estimate accounts for costs from the following areas: (1) SSA employee (e.g., field office, 800 number, DDS staff) information collection and processing time; and (2) systems development, updating, and maintenance costs.

**15. Program Changes or Adjustments to the Information Collection Request**

When we last cleared this IC in 2015, the burden was 225,458 hours. However, we are currently reporting a burden of 206,935 hours. This change stems from the discontinuation of the SSNVS telephone verification service, and a decrease in the number of responses for the SSNVS electronic verification service from 2,698,500 to 2,483,220. There is no change to the burden per response for this application.

**16. Plans for Publication Information Collection Results**

SSA will not publish the results of the information collection.

**17. Displaying the OMB Approval Expiration Date**

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. Collection of Information Employing Statistical Methods**

SSA does not use statistical methods for this information collection.