

Supporting Statement for Forms SS-5, SS-5-FS
Application for a Social Security Number (SSN) Card, the Social Security Number
Application Process (SSNAP) and the Internet SSN Replacement Card (iSSNRC)
Application
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 Section 20 CFR 422.103-422.110 of the *Code of Federal Regulations (Code)* authorize the Social Security Administration (SSA) to assign Social Security numbers (SSNs) and issue SSN cards for those numbers. Section 20 CFR 422.107 of the *Code* 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 an SSA-approved application designed for this purpose. Section 20 CFR 422.103(e)(2) of the *Code* 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 the SSNAP application when issuing a card via telephone or in person. In addition, hospitals collect the same information on SSA's behalf for newborn children through the Enumeration-at-Birth process. In this process, parents of newborns provide hospital birth registration clerks with information required to register these newborns. Hospitals send this information to State Bureaus of Vital Statistics (BVS), and they 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 (SSN) and issue a Social Security card. Respondents can also use these modalities to request a change in their SSN records. Finally, the iSSNRC Internet application collects information similar to the paper SS-5 for no-change replacement SSN cards for adult U.S. citizens. The iSSNRC modality allows certain applicants for SSN replacement cards to complete the Internet application and submit the required evidence online rather than completing a paper Form SS-5. The respondents for this collection are applicants for original and replacement Social Security cards, or individuals who wish to change information in their SSN records, who use any of the modalities described above.

3. **Use of Information Technology to Collect the Information**
In accordance with the agency's Government Paperwork Elimination Act plan, SSA created electronic versions of Form SS-5, and Form SS-5-FS (including the Internet version, iSSNRC, and the SSNAP system described above). Based on our data, we estimate approximately 90% of respondents under this OMB number use the electronic versions.
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 Forms SS-5 and SS-5-FS, 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. 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 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 April 24, 2018, at 83 FR 17872, and we received no public comments. The 30-day FRN published on July 26, 2018 83 FR 35526. If we receive any comments in response to this Notice, we will forward them to OMB.

Note: The first Federal Register Notice shows incorrect burden information for the SS-5, SS-5-FS, SSNAP and iSSNRC. We corrected for this in the second Notice, in #12 below, and on ROCIS.
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

The following chart shows the burden for each application scenario. Respondents for each of these scenarios may use any of the current modalities available for the SS-5 and SS-5-FS, unless otherwise indicated in the chart below:

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	10,500,000	1	8.5	1,487,500
Adult U.S. Citizens requesting a replacement card with no changes through the iSSNRC modality*	480,000	1	5	40,000
Respondents whom we ask to provide parents' SSNs (when applying for original SSN cards for children under age 12)	250,000	1	9	37,500
Applicants age 12 or older who need to answer additional questions so SSA can determine whether we previously assigned an SSN	1,470,000	1	9.5	232,750
Applicants asking for a replacement	4000	1	60	4000

SSN card beyond the new allowable limits (i.e., who must provide additional documentation to 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	12,705,000			1,802,000

The total annual burden is **1,802,000** hours. We based these figures on current management information data. This figure represents burden hours, and we calculated a separate cost burden for the Enumeration at Birth (EAB) process.

13. Annual Cost to the Respondents (Other)

Under the EAB process, the State BVSs incur costs for participating in EAB. The State BVSs incur a total cost of approximately \$6,875,000 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 \$454 million. This estimate accounts for costs from the following areas: (1) designing, printing, and distributing the form; (2) SSA employee (e.g., field office, 800 number, DDS staff) information collection and processing time; and (3) systems development, updating, and maintenance costs.

15. Program Changes or Adjustments to the Information Collection Request

When we last cleared this information collection in 2015, the burden was 1,911,150 hours. However, we are currently reporting a burden of 1,802,000 hours. This change stems a decrease in the number of respondents applying for replacement cards at SSA offices. There is no change to the burden time per response. Although the number of

responses changed, SSA did not take any actions to cause this change. There is a cost burden increase which stems from transmitting data to SSA's mainframe.

16. Plans for Publication Information Collection Results

SSA will not publish the results of the information collection.

17. Displaying the OMB Approval Expiration Date

Paper Forms SS-5, SS-5-FS

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.

iSSNRC & SSNAP

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. Collections of Information Employing Statistical Methods

SSA does not use statistical methods for this information collection.