

**Justification for Non-Substantive Changes for Promoting Opportunity  
Demonstration  
OMB No. 0960-0809**

**Justification for Non-Substantive Changes to the Collection**

We are making the following changes to the POD Monthly Earnings and IRWE Reporting Form:

- **Change #1:** On the POD Monthly Earnings and IRWE Reporting Form (paper and online), we want to include instructions for participants to indicate whether they are self-employed.

**Justification #1:** We have received feedback from the implementation team processing completed monthly reporting forms submitted by participants that it is difficult to distinguish between self-employed participants with a business name who don't need to include paystubs with participants who are not self-employed and need to include paystubs. In the original submission for clearance, we expected that POD participants who are self-employed would list "self-employed" in the field on the form for the employer name. During the POD pilot period, the POD Implementation Contractor found that many self-employed participants have named the entity under which they work and list that name on the form. We require participants to submit documentation of monthly earnings if they are not self-employed, but not if they are self-employed. When a participant lists an entity's name in the employer name field and does not include documentation when they submit the monthly reporting form, the Implementation Contractor does not know if the participant is self-employed and whether documentation is required before the contractor can submit the participant's monthly earnings to SSA. Because the window for the Implementation Contractor to submit monthly earnings information to SSA is short, the need to call participants to confirm if they are self-employed could cause earnings information to be submitted late, which would then cause the participant's benefit check to be paid incorrectly under POD rules.

- **Change #2:** We request to add SORN 60-0059, entitled Earnings Recording and Self-Employment Income System to the Privacy Act Statement.

**Justification #2:** The systems of records notices that should be listed on a PA Statement are those systems in which SSA will maintain the personal information that the individual provides to the agency. Our Office of General Counsel recommended the addition of this SORN after we received OMB approval. They indicated we need this SORN because "this system contains information about ... individuals or any person requesting, reporting, changing and/or inquiring about earnings information." The system is used for the following purposes including but not limited to "a primary working record file of all SSN holders; provide information for determining amount of benefits; record all incorrect or incomplete earnings items, statistical studies; identification of possible overpayments of benefits; and identification of individuals entitled to additional benefits."

We are currently accepting the risk of not identifying this SORN in the Privacy Act Statement. We are requesting this change to comply with the recommendation made by our Office of General Counsel now because of the need to submit the first request.

**Justification for Resubmission of the Collection within One Year of OMB Approval**

We are requesting these changes now, within one year of approval, because participants are already submitting the monthly reporting form to the Implementation Contractor. The Implementation Contractor's inability to identify who is self-employed without calling the participant delays the submission of earnings information to SSA. Without the timely submission of this information, SSA cannot generate SSDI benefit checks correctly under POD rules. In addition, as we mentioned above, if we do not include the SORN reference, we are not in compliance with the Privacy Act.

These changes will not affect the burden for this form.

We will implement this changes upon OMB approval.