

Supporting Statement for SSA- L3231-C1
Employer Verification of Records for Children Under Age 7
20 CFR 404.801-404.803, 404.821-404.822
OMB No. 0960-0505

A. Justification

1. Introduction/Authoring Laws and Regulations

Section 205(a) of the *Social Security Act (Act)* provides the Commissioner of the Social Security Administration (SSA) with the authority to make the rules, regulations, and procedures needed to carry out provisions of the *Act*. Section 205(c)(2)(A) of the *Act* charges the Commissioner with establishing and maintaining records of the amounts of wages paid and the amounts of self-employment income individuals derive. 20 CFR 404.803 of the *Code of Federal Regulations* explains that, SSA records are evidence of the amounts of individual's earnings and the periods in which SSA received them. Sections 20 CFR 404.821-404.822 explains the procedures SSA follows to investigate and correct incorrect earnings records.

2. Description of Collection

To ensure we credit the correct person with the reported earnings, SSA verifies wage reports for children under age seven with the children's employers before posting to the earnings record. SSA uses form SSA-L3231-C, Request for Employer Information, for this purpose. The respondents are employers who report earnings for children under age seven.

3. Use of Information Technology to Collect the Information

SSA did not create an electronic version of Form SSA-L3231-C1 under the agency's Government Paperwork Elimination Act (GPEA) plan because only 11,823 respondents complete the form annually. This is less than the GPEA cut-off of 50,000.

4. Why We Cannot Use Duplicate Information

The nature of the information we collect and the manner in which we collect it precludes duplication. SSA does not use another collection instrument to obtain similar data.

5. Minimizing Burden on Small Respondents

This collection does not significantly 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-L3231-C1, we would have no way of determining if the wages reported for a child under age seven were truly that child's earnings, or if they were actually another worker's earnings. If SSA could not make this determination, the agency might improperly post wages to the wrong earnings

records. As a result, incorrect entitlement to Social Security benefits could occur. In addition, the workers who actually earned these wages would not receive proper credit for them, and their future Social Security benefits may be incorrect, or incorrectly denied. 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 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 December 26, 2018, at 83 FR 66330, and we received no public comments. The 30-day FRN published on April 4, 2019 at 84 FR 13389. If we receive any comments in response to this 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 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-L3231-C1	11,823	1	10	1,971

The total burden for this ICR is **1,971** hours. We based these figures on current management information data. 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 **\$12,934**. This

estimate accounts for costs from the following areas: (1) designing, printing, and distributing the form; and (2) SSA employee (e.g., field office, 800 number, DDS staff) information collection and processing time.

- 15. Program Changes or Adjustments to the Information Collection Request**
When we last cleared this IC in 2016, the burden was 3,333 hours. However, we are currently reporting a burden of 1,971 hours. This change stems from a decrease in the number of responses from 20,000 to 11,823. 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.
 - 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.