

**Justification for Non-Substantive Changes for Form SSA-820-BK
Work Activity Report - Self-Employment
20 CFR 404.1520(b), 404.1571-404.1576, 404-1584-404.1593, and
416-971-416.976
OMB No. 0960-0598**

Revisions to the Collection Instrument:

- **Change #1:** In the cover letter, first page: we are replacing “Claim Number:” with “BNC#.”

Justification #1: On September 15, 2017, the President signed into law H.R. 624, the Social Security Number Fraud Prevention Act of 2017, which became Public Law No. 115-59. The Senate passed the bill on September 6, 2017, by unanimous consent. The law, among other things, restricts the inclusion of Social Security Numbers (SSN) on documents sent by mail by the Federal Government. We are updating the form to replace the SSN with the Beneficiary Notice Control number (BNC#) to comply with the new law.

- **Change #2:** In the cover letter, second page, under the Universal Text Identifier caption, we are updating the fraud language as follows:

Suspect Social Security Fraud

If you suspect Social Security fraud, please visit <http://oig.ssa.gov/report> or call the Inspector General's Fraud Hotline at 1-800-269-0271 (TTY 1-866-501-2101).

Justification #2: The prior version did not reflect our current fraud language. We are updating the fraud language to reflect the current URL the agency is using for reporting fraud.

- **Change #3:** On Form SSA-820-BK, Page 1, in the “**Information – To Be Completed By Person Applying For Or Receiving Benefits,**” first section: we are bolding the number “1.”

Justification #3: We are bolding this number to be consistent with other sections’ font and style formatting.

- **Change #4:** On Form SSA-820-BK, Page 1, in the “**Information – To Be Completed By Person Applying For Or Receiving Benefits,**” second section: we are removing the space between the “2” and the “.” so it shows as “2.”

Justification #4: We are removing the space to be consistent with other sections’ font and style formatting.

- **Change #5:** On Form SSA-820-BK, Page 1, in the “**Information – To Be Completed By Person Applying For Or Receiving Benefits,**” third section: We are

changing the box that reads, “Average Number of Hours Worked” to read “Average Number of Hours Worked Per Month”

Justification #5: For self-employment purposes, we determine Trial Work Period months as “service months” when an individual works more than 80 hours per month. The prior version of this form did not clarify the timeframe for the hours worked. We are updating the form to clarify that the individual should denote the hours worked in a month.

- **Change #6:** On Form SSA-820-BK, Page 1, in the “**Information – To Be Completed By Person Applying For Or Receiving Benefits,**” third section: we are adding a box and additional option for “Independent Contractor” under the “Type of ownership arrangement / (Check one)” section.

Justification #6: We are adding this option as Independent Contractor is one of the most common types of self-employment, and it was an oversight for us to leave it out of the options.

- **Change #7:** On Form SSA-820-BK, Page 2, in the “**Information – To Be Completed By Person Applying For Or Receiving Benefits,**” fifth section: we are changing “5.” to read: “Please attach all of your self-employment tax returns (including your Schedule C & SE or 1099) **since the DATE shown in the identification section.**”

Justification #7: The prior version of this form only noted “Schedule C and SE.” Users of the form suggested that a technician might also use Form 1099, so we are including it as a reference in the instruction.

- **Change #8:** We are including a Work Continuing Disability Review (CDR) Due Process Notice-Extended Period of Eligibility Cessation Notice, on which we replaced the SSN with the BNC.

Justification #8: As part of our long-standing process, we send the beneficiary a substantial gainful activity proposed decision (or due process) notice after conducting a work CDR. This notice includes a chart summarizing the beneficiary’s earnings; our earnings guidelines; and whether the beneficiary is due any benefits. The notice is informative to the beneficiary, but does not require any information from them. We inadvertently did not include this notice as part of the previous renewal of this ICR due to an oversight. We anticipate Systems implementation of this notice to coincide with the agency’s efforts to replace the SSN with the BNC number by the end of Fiscal Year 2022, which is why we updated the Notice with the BNC (in place of the SSN).

We will begin using the revised version of this form and cover letter (and will release our systems implementation) after obtaining OMB approval. We do not anticipate that any of the above revisions will affect the current burden information for this collection.