

Supporting Statement for Form SSA-7008
Request for Correction of Earnings Record
20 CFR 404.820 and 20 CFR 422.125
OMB No. 0960-0029

A. Justification

1. **Introduction/Authoring Laws and Regulations**
Sections 205(a), 205(c(4)-(5), and 233 of the *Social Security Act (Act)* state the Commissioner of the Social Security Administration (SSA) may correct or amend the earnings records of individuals if necessary. Sections 20 CFR 404.820 and 20 CFR 422.125 of the *Code of Federal Regulations* establish the procedures and policies for correcting individuals' earnings records. SSA uses Form SSA-7008 to collect the information necessary to carry out these procedures.
2. **Description of Collection**
Individuals alleging inaccurate earnings records in SSA's files use Form SSA-7008, or a personal interview during which SSA employees key their answers into our electronic Earnings Modernization Item Correction (ICOR) system, to provide the information SSA needs to check earnings posted, and, as necessary, initiate development to resolve any inaccuracies. The respondents are individuals who request correction of earnings posted to their Social Security earning records.
3. **Use of Information Technology to Collect the Information**
In accordance with the agency's Government Paperwork Elimination Act plan, SSA created an Intranet version of Form SSA-7008, the ICOR system, which allows SSA to take the majority of requests for correction of an individual's earnings record in person, or via telephone interview, and enter the data directly into the system. Based on our data, we estimate approximately 90% 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. **Consequences of Not conducting Information or Collecting it Less Frequently**
If we did not use Form SSA-7008, we would have no means of verifying an individual's earnings record when the accuracy of SSA's records is in question. In addition, SSA could potentially have inaccurate earnings records for a worker, which

could lead to the worker receiving improper Social Security benefits (underpayment or overpayment) at the end of the worker’s career. Because we 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 Circumstance

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 February 5, 2020, at 85 FR 6671, and we received no public comments. The 30-day FRN published on April 7, 2020 at 85 FR 19563. 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 the Respondents

SSA does not provide payment or gifts to the respondents.

10. Assurances of Confidentiality

SSA protects and holds confidential the information we collect 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) | Average Theoretical Hourly Cost Amount (dollars)* | Average Wait Time in Field Office (minutes)*** | Total Annual Opportunity Cost (dollars)** |
|----------------------------------|-----------------------|-----------------------|---------------------------------------|---------------------------------------|---|--|---|
| SSA-7008 | 28,734 | 1 | 28 | 13,409 | \$22.50* | 24*** | \$301,702** |
| In-person or telephone interview | 337,500 | 1 | 10 | 56,250 | \$22.50* | 24*** | \$1,265,625** |
| Totals | 366,234 | | | 69,659 | | | 1,567,328** |

* We based this figure on average U.S. worker’s hourly wages, as reported by Bureau of Labor Statistics data.

** This figure does not represent actual costs that SSA is imposing on recipients of Social Security payments to complete this application; rather, these are theoretical opportunity costs for the additional time respondents will spend to complete the application. **There is no actual charge to respondents to complete the application.**

*** We based this figure on the average FY 2020 wait times for field offices, based on SSA's current management information data.

The total burden for this ICR is **69,659** burden hours (reflecting SSA management information data), which results in an associated theoretical (not actual) opportunity cost financial burden of **\$1,567,328**. SSA does not charge respondents to complete our applications

13. **Annual cost to the Respondents**

This collection does not impose a known cost burden on the respondents.

14. **Cost to the Federal Government**

The annual cost to the Federal Government is approximately \$2,089,776. 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. **Changes to the Public Reporting Burden**

When we last cleared this IC in 2016, the burden was 62,500 hours. However, we are currently reporting a burden of 69,659 hours. This change stems a decrease in the number of responses from 375,000 to 366,234. Although the number of responses changed, SSA did not take any actions to cause this change. In addition, there has been a change to the burden time per response. We updated our burden time per response from 10 minutes to 28 minutes, based on our current management information data, which shows that the average respondent takes more time to complete the information. We made no revisions to the information collection, which would necessitate a change in burden.

16. **Plans for 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 will not use statistical methods for this information collection.