

Supporting Statement for myWageReport
20 CFR 404.1520(b), 404.1571-1576, & 404.1584-1593
OMB No. 0960-0808

A. Justification

1. Introduction/Authoring Laws and Regulations

The Social Security Disability Insurance (SSDI) program, allows beneficiaries to receive payments based on their ability to engage in substantial gainful activity, because of a physical or mental condition. The Social Security Administration (SSA) requires SSDI beneficiaries or their representative payees to report when beneficiaries return to work, when their amount of work increases, or when their earnings increase. SSA's Title XVI program similarly requires that Supplemental Security Income (SSI) recipients or their representative payees report work and earnings. SSA allows SSDI beneficiaries, SSI recipients and deemors, and representative payees to report earnings via an Internet reporting system called "myWageReport." The myWageReport application generates a receipt after each report. Previously, SSDI beneficiaries and SSI recipients could only report by calling our 800 number, coming into a local field office (FO), or mailing paystubs/earnings to local FOs. In addition, SSI recipients and payees could report earnings via telephone and through a mobile application. Section 826 of the *Bipartisan Budget Act (BBA) of 2015, P.L. 114-74*, requires SSA to offer SSDI beneficiaries similar electronic or automated receipt wage reporting methods available to SSI recipients. Accordingly, we created an Internet reporting system for this purpose. Title XVI, section 1631(d) (1) of the *Social Security Act (Act)* authorizes the Commissioner of SSA to conduct quality review processes. Title XVI regulatory authority is provided in section 20 CFR 416.701-416.732 of the *Code of Federal Regulations*, which requires SSI recipients to report changes that could affect SSI eligibility and payment amount (i.e. changes in income, resources, and living arrangements). Section 202 of the *Social Security Protection Act (42 USC 902)* requires SSA to issue receipts to SSDI and SSI recipients, or their representatives, when they report wages. Section 223(d) (4) of the *Act* provides the Commissioner of SSA with the authority to provide regulations for administering the disability provisions of the law. The associated regulations are contained in sections 20 CFR, 404.1520(b), 404.1571-1576, and 404.1584-1593 of the *Code of Federal Regulations*.

2. Description of Collection

The myWageReport application enables SSDI beneficiaries, SSI recipients, and representative payees to report paystub information to SSA via a secure Internet application. It also generates a receipt, thus providing confirmation that SSA received the earnings report. For SSDI, SSA's system screens the myWageReport submission and determines the need for additional employment information. If so, agency personnel reach out to beneficiaries or their representative payees, and use Form SSA-821, Work Activity Report (OMB Control No. 0960-0059) to collect the additional required information. For SSI

recipients, myWageReport calculates a monthly total for the wage submission and automatically sends the information to the appropriate record, preventing improper payments and virtually eliminating the need for manual intervention by SSA staff. The respondents for this collection are SSDI beneficiaries or their representative payees.

3. **Use of Information Technology to Collect the Information**

We collect this information electronically under the agency's Government Paperwork Elimination Act plan via the Internet, through SSA's public facing my Social Security account portal via the SSA website: www.socialsecurity.gov. The myWageReport application allows users to access the application on their desktop, laptop, or mobile device(s). Users provide requested information by making selections via dropdown boxes; radio buttons; and keying specific paystub information. SSA receives the collected information over secure channels. We also collect this information through a telephone process; by mail; or in-person for those who cannot, or choose not to, submit wages over the Internet (OMB Control No. 0960-0807). SSI recipients may also report via a mobile wage reporting application (OMB Control No. 0960-0715). The Internet process established with myWageReport allows SSDI beneficiaries, SSI recipients, and representative payees to submit detailed wage information online only.

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 affect small businesses or other small entities.

6. **Consequence of Not Collecting Information or Collecting it Less Frequently**

If we did not use the myWageReport application, we would not comply with Section 826 of the Bipartisan Budget Act of 2015. In addition, if an SSDI beneficiary or representative payee is unable to visit a field office or reach an SSA representative over the phone, they are in violation of their reporting responsibilities contained in 20 CFR 404.1588. If the SSDI beneficiary or representative payee is unable to report work, the SSDI beneficiary is potentially receiving benefits that SSA could later determine were not payable because the SSDI beneficiary was not meeting the disability requirements of the law. This collection offers an Internet-based method for SSDI beneficiaries to report wages. Because we collect this 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 May 5, 2020, at 85 FR 26776, and we received no public comments. The 30-day FRN published on July 28, 2020, at 85 FR 45723. 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.

Additionally, SSA protects and holds confidential the information it receives by adhering to our Internet Privacy Policy, which stipulates:

- The public does not need to give us personal information to visit our site;
- We collect personally identifiable information (name, social security number, date of birth, or e-mail) only if we know beneficiaries or their representatives provided it;
- We only use personal identifying information in conjunction with services beneficiaries requested at the time they submitted the information to us;
- We sometimes perform statistical analyses of user behavior in order to assess customer interest in the various areas of our site. We will disclose this information to third parties only in aggregate, never specific form;
- We never give, sell, or transfer any personal information to a third party.

We also take the following measures to ensure the confidentiality of applicants' personal information:

- We encrypt all electronic requests using the Secure Socket Layer (SSL) security protocol. SSL encryption prevents a third party from reading the transmitted data even if they intercept any data. This protocol is an industry standard used by banks such as Wells Fargo and Bank of America for Internet banking;
- We give applicants adequate warnings that the Internet is an open system, and there is no absolute guarantee others will not intercept and decrypt the personal information the applicants submitted. We advise applicants about alternative methods of requesting personal information, i.e., personal visit to a

field office or a call to the 800 number;

- We will only allow requestors access to additional screens used for making changes to personal information or requests to SSA once we verify requestor identity.

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)*	Total Annual Opportunity Cost (dollars)**
myWageReporting	88,000	1	7	10,267	\$10.22*	\$104,929**

*We based this figure on average Information and Records clerk’s hourly salary, as reported by Bureau of Labor Statistics data (https://www.bls.gov/oes/current/oes_nat.htm).

** 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.**

The total burden for this ICR is **10,267** burden hours (reflecting SSA management information data), which results in an associated theoretical (not actual) opportunity cost financial burden of **\$104.929**. SSA does not charge respondents to complete our applications.

13. Annual Cost to the Respondents (Other)

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

14. Annual Cost To Federal Government

The annual cost to the Federal Government is approximately **\$424,437**.

Description of Cost Factor	Methodology for Estimating Cost	Cost in Dollars*
SSA Employee (e.g., field office, 800 number, DDS staff) Information Collection and Processing Time	GS-9 employee x # of responses x processing time	\$224,437
Systems Development, Updating, and Maintenance	GS-9 employee x man hours for development, updating, maintenance	\$200,000
Total		\$424,437

SSA is unable to break down the costs to the Federal government further than we already have. We do not track design costs or upkeep costs (as these are based on employee time and may vary from collection to collection). In addition, because so many employees have a hand in each aspect of our forms, we use an estimated average hourly wage, based on the wage of our average field office employee (GS-9) for these calculations. Finally, SSA prefers not to provide breakdowns of estimated payment to employees who process these items for a variety of reasons (only one of which is that it is not possible to do this entirely accurately).

15. Program Changes or Adjustments to the Information Collection Request

When we last cleared this IC in 2017, the burden was 61,067 hours. However, we are currently reporting a burden of 10,267 hours. This change stems a decrease in the number of responses from 458,000 to 88,000. 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. These figures represent current Management Information data.

16. Plans for Publication Information Collection Results

SSA will not publish the results of the information collection.

17. Displaying the OMB Approval Expiration Date

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.