# Supporting Statement for Form SSA-7050-F4 Request for Social Security Earnings Information 20 CFR 401.100 and 404.810 OMB No. 0960-0525

#### A. Justification

#### 1. Introduction/Authoring Laws and Regulations

The Social Security Administration (SSA) uses the Request for Social Security Earnings Information, Form SSA-7050-F4, for Social Security number (SSN) holders or their legal representatives to request an Itemized Statement of Earnings (Form SSA-1826) for various non-program related reasons. Section 205(c)(2)(A) of the Social Security Act (Act) mandates the disclosure of earnings. Section 20 CFR 404.810 of the Code of Federal Regulations describes the information individuals must provide to obtain a statement of earnings and a benefit estimate statement. Section 20 CFR 401.100 describes the rules for disclosure of official records and information.

# 2. Description of Collection

SSA uses the information the respondent provides on Form SSA-7050-F4 to verify the wage earner has: (1) earnings; (2) the right to access the correct Social Security Record; and (3) the right to request the earnings statement. If we verify all three items, SSA produces an Itemized Statement of Earnings (Form SSA-1826) and sends it to the requester. Respondents are wage earners and their authorized representatives who are requesting Itemized Statement of Earnings records.

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

We currently make Form SSA-7050-F4 available on the Internet in a fillable PDF format which can completed, printed, and sent to SSA for processing. Once we receive the form showing identifying information, and the authorizing signature, we review it manually. Following review, we key the data into an electronic program developed to control requests and to obtain the necessary information. The MySSA.gov website allows the public access to printout the SSA-7050-F4 for mailing to the administration. This collection does not currently have a fully public-facing Internet version, as we prioritized other information collections for full electronic conversions. As per our 4/3/20 conversation with OIRA, we welcome OIRA to join our conversations with OMB on IT Mods; however, as our IT Mod programming is an ongoing project, we cannot provide timelines for when we will be able to make any particular ICR available via the Internet. We will convert existing ICRs to full electronic versions depending on how they fall within our overall IT Mod schema, but this unconnected to the PRA approval lifecycle.

#### 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. **Consequence of Not Collecting Information or Collecting it Less Frequently** If we did not collect this information, we would deny the requester's right to obtain information about their earnings record, thus violating the mandate in Section 205(c)(2)(A) of the Act, which requires SSA to disclose earnings. 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 October 8, 2020 at 85 FR 63630, and we received no public comments. The 30-day FRN published on December 8, 2020 at 85 FR 79064. If we receive any comments in response to this Notice, we will forward them to OMB.

# 9. Payment or Gifts to Respondents

SSA does not provide payment 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

Please see the burden chart below:

<b>Modality of</b>	Number of	Frequency	Average	Estimated	Average	Total
Completion	Respondents	of	Burden	Total	Theoretical	Annual
_	_	Response	per	Annual	Hourly	Opportunity
			Response	Burden	Cost	Cost
			(minutes)	(hours)	Amount	(dollars)**
					(dollars)*	
SSA-7050-F4	66,800	1	11	12,247	\$25.72*	\$314,993**

<sup>\*</sup> We based this figure on the average U.S. worker's hourly wages, as reported by Bureau of Labor Statistics data (<a href="https://www.bls.gov/oes/current/oes\_nat.htm">https://www.bls.gov/oes/current/oes\_nat.htm</a>).

\*\* 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 information collection request is **12,247** hours (reflecting SSA management information data), which results in associated theoretical (not actual) opportunity cost financial burden of **\$314,993**.

# 13. Annual Cost to the Respondents (Other)

Participating requesters must compensate SSA for non-program-related work so the Social Security Trust Funds do not bear the costs of such activities. Page 2 of the form provides the requester with a cost explanation and fee charge per request. Please see the chart below for the costs to the respondents for these requests:

Type of Respondent	Number of	Cost per	<b>Annual Cost</b>
	requests	request	
Non-Certified Respondent	33,400	\$92.00	\$3,072,800
Certified Respondent	33,400	\$122.00	\$4,074,800
Total			\$7,147,600

#### 14. Annual Cost To Federal Government

The annual cost to the Federal Government is approximately \$306,750. This estimate accounts for costs from the following areas:

Description of Cost Factor	Methodology for Estimating Cost	Cost in Dollars*
Designing and Printing the Form	Design Cost + Printing Cost	\$0
Distributing, Shipping, and Material	Distribution + Shipping + Material	\$0
Costs for the Form	Cost	
SSA Employee (e.g., field office, 800	GS-9 employee x # of responses x	\$306,175
number, DDS staff) Information	processing time	
Collection and Processing Time		
Full-Time Equivalent Costs	Out of pocket costs + Other	\$0
	expenses for providing this service	
Systems Development, Updating, and	GS-9 employee x man hours for	\$575
Maintenance	development, updating,	
	maintenance	
Quantifiable IT Costs	Any additional IT costs	\$0
Total		\$306,750

<sup>\*</sup> We have inserted a \$0 amount for cost factors that do not apply to this collection.

SSA is unable to break down the costs to the Federal government further than we already have. First, since we work with almost every US citizen, we often do

bulk mailings, and cannot track the cost for a single mailing. In addition, it is difficult for us to break down the cost for processing a single form, as field office and State Disability Determination Services staff often help respondents fill out several forms at once, and the time it takes to do so can vary greatly per respondent. As well, 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. However, we have calculated these costs as accurately as possible based on the information we collect for creating, updating, and maintaining these information collections.

# **15. Program Changes or Adjustments to the Information Collection Request** There are no changes to the public reporting burden.

# **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.