

**Supporting Statement for
Online Request for Correction of Earnings Record
20 CFR 404.820 & 422.125
OMB No. 0960-NEW**

A. Justification

1. Introduction/Authoring Laws and Regulation

We are offering an alternative to the paper process of requesting a correction to an earnings record, and launching a service that enables our users to make these same requests electronically via the online *my Social Security* portal. The information we collect from the public on the new Internet screens, will not exceed that which we request on the paper Form SSA-7008, OMB No. 0960-0029, Request for Correction of Earnings Record.

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.

2. Description of Collection

If an individual alleges an inaccurate earnings record in SSA's files, they can submit earnings correction requests electronically on the Online Request for Correction of Earnings Record screens, via the agency's online secure web platform *my Social Security* portal. These Internet screens collect information, which supports an earnings correction action, such as employer names, addresses, wage amounts, and pertinent details about the nature of employment. This information collection is not mandatory for requesting an earnings correction action. However, SSA encourages respondents to submit supporting evidence, as determined by the Commissioner of Social Security, to support the earnings correction action. We collect information from individuals only. The earnings correction request does not include private businesses, farms, non-profits, or state or local governments. The respondents are authorized, authenticated individuals accessing the earnings correction process from their personal *my Social Security* account.

3. Use of Information Technology to Collect the Information

In accordance with the agency's Government Paperwork Elimination Act plan, SSA is creating this electronic collection to enable an individual's access to the earnings correction process from their personal, authenticated, authorized *my Social Security* account. We estimate that 100% of the respondents use the *my Social Security* portal to access and submit this request, as it is only accessible via the Internet.

4. **Why We Cannot Use Duplicate Information**
We collect similar information on paper Form SSA-7008, OMB No. 0960-0029, Request for Correction of Earnings Record. However, for this information collection request, we are creating a fully electronic means to enable our users to make these same requests via the online [my Social Security](#) portal.
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 have no means of verifying an individual's earnings record through an Internet application 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 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 July 29, 2020 at 85 FR 45723, and we received no public comments. The 30-day FRN published on October 8, 2020 at 85 FR 63630. 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 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**
Please see the burden chart below:

| Modality of Completion | Number of Respondents | Frequency of Response | Average Burden per | Estimated Total Annual | Average Theoretical Hourly | Total Annual Opportunity Cost (dollars)** |
|------------------------|-----------------------|-----------------------|--------------------|------------------------|----------------------------|---|
|------------------------|-----------------------|-----------------------|--------------------|------------------------|----------------------------|---|

| | | | Response (minutes) | Burden (hours) | Cost Amount (dollars)* | |
|--|--------|---|-------------------------------|---------------------------|---------------------------------------|-------------|
| Online Request for Correction of Earnings Record | 76,047 | 1 | 15 | 19,012 | \$25.72* | \$488,989** |

* We based this figure on average U.S. worker's hourly wages, 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 **19,012** burden hours (reflecting current SSA management information data and our usability testing for these screens), which results in an associated theoretical (not actual) opportunity cost financial burden of **\$488,989**. 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 on the respondents.

14. Annual Cost To Federal Government

The annual cost to the Federal Government is approximately \$515,300. 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 Costs for the Form | Distribution + Shipping + Material Cost | \$0 |
| SSA Employee (e.g., field office, 800 number, DDS staff) Information Collection and Processing Time | GS-9 employee x # of responses x processing time | \$475,300 |
| Full-Time Equivalent Costs | Out of pocket costs + Other expenses for providing this service | \$0 |
| Systems Development, Updating, and Maintenance | GS-9 employee x man hours for development, updating, maintenance | \$40,000 |
| Quantifiable IT Costs | Any additional IT costs | \$0 |

| | | |
|--------------|--|------------------|
| Total | | \$515,300 |
|--------------|--|------------------|

* 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. 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

This is a new online service, allowing users to initiate earnings correction requests, that increases the public reporting burden. See #12 above for updated burden figures.

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.