

Supporting Statement for Form SSA-7011-F4
Statement of Employer
20 CFR 404.801-404.803
OMB No. 0960-0030

A. Justification

1. Introduction/Authoring Laws and Regulations

Section 205(c)(2)(A) of the *Social Security Act (Act)* charges the Commissioner with establishing and maintaining records of the amounts of wages SSA pays to individuals, and the amounts those individuals make in self-employment income. Section 205(d) of the *Act* provides the authority for the Social Security Administration (SSA) to issue a subpoena if an employer refuses to furnish the requested information. Regulations at 20 CFR 404.801-404.802 of the *Code of Federal Regulations* describe the procedures SSA uses to implement Section 205(c)(2)(A) of the *Act*. 20 CFR 404.803 explains that we may use our records and other evidence, such as a statement from an employer, to substantiate the amounts of earnings credited to an individual.

2. Description of Collection

When workers report they were paid wages, but cannot provide proof of those earnings, and the wages do not appear in SSA's records of earnings, SSA uses Form SSA-7011-F4 to document the alleged wages. Specifically, the agency uses the form to resolve discrepancies in the individual's Social Security earnings record, and to process claims for Social Security benefits. We only send Form SSA-7011-F4 to employers if we are unable able to locate the earnings information within our own records. The respondents are employers who can verify wage allegations made by wage earners.

3. Use of Information Technology to Collect the Information

Form SSA-7011-F4 is available on SSA's website in a fillable PDF format. Once the form is completed, the respondent prints it, and mails it to the agency with supporting documentation. Based on our data, we estimate approximately 100% of respondents for this collection use the fillable PDF version and mail it in to SSA.

This collection does not currently have a fully public-facing Internet version, as we prioritized other information collections for full electronic conversions. Given that IT Mod programming is an ongoing, dynamic project, we cannot provide specific timelines for when we will be able to make any particular ICR available via Internet web-based application. We will ultimately convert most existing ICRs to full electronic versions depending on how they fall within our overall IT Mod schema, but this may be unconnected to the PRA approval lifecycle.

In the interim, we evaluated this collection for conversion to a submittable PDF and intend to make this conversion within the next 3-6 years. Once we have the

submittable PDF ready for implementation, we will submit a Change Request to OMB for prior approval.

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 significantly affect small businesses or other small entities.

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

If we did not use Form SSA-7011-F4, it could result in incorrect payments or incorrect denials of benefits to the public. 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 July 2, 2021 at 86 FR 35371, and we received no public comments. The 30-day FRN published on September 2, 2021 at 86 FR 49403. 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 Response | Estimated Total Annual Burden | Average Theoretical Hourly Cost | Total Annual Opportunity Cost |
|------------------------|-----------------------|-----------------------|-----------------------------|-------------------------------|---------------------------------|-------------------------------|
| | | | | | | |

| | | | (minutes) | (hours) | Amount (dollars)* | (dollars)** |
|-------------|-----|---|-----------|---------|----------------------|-------------|
| SSA-7011-F4 | 500 | 1 | 30 | 250 | \$27.07* | \$6,768** |

* We based this figure on the average U.S. worker's hourly wages, as reported by Bureau of Labor Statistics data (https://www.bls.gov/oes/current/oes_nat.htm#00-0000).

** 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 **30** burden hours (reflecting SSA management information data), which results in an associated theoretical (not actual) opportunity cost financial burden of **\$6,768**. SSA does not charge respondents to complete our applications. We base our burden estimates on current management information data, which includes years of conducting this information collection. Per our management information data, we believe that the 30 minutes accurately shows the average burden per response for reading the instructions, gathering the facts, and answering the questions. Based on our current management information data, the current burden information we provided is accurate.

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 \$11,120. 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 | \$200 |
| 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 | \$7,500 |
| 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 | \$3,420 |

| | | |
|-----------------------|-------------------------|-----------------|
| Quantifiable IT Costs | Any additional IT costs | \$0* |
| Total | | \$11,120 |

* 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. It is difficult for us to break down the cost for processing a single form, as so many employees have a hand in each aspect of our forms; therefore, 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

When we last cleared this IC in 2018, the burden was 167 hours. However, we are currently reporting a burden of 250 hours. This change stems from an increase in the completion time from 20 minutes to 30 minutes. After review of our burden estimate, we determined that 30 minutes more accurately represents completion time, and is supported by 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

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.