

**Supporting Statement for Form SSA-1414**  
**Credit Card Payment Form**  
**OMB No. 0960-0648**

**A. Justification**

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

Section 702(a)(4) of the *Social Security Act (Act)* gives the Commissioner the responsibility and power to discharge all duties of the Social Security Administration (SSA), and full authority and control over all personnel and activities. For many years, the Federal government has accepted credit card payments for debts owed by individuals and businesses. The Department of the Treasury, which creates the Federal government's general debt collection policy and procedures, has long encouraged the use of electronic funds transfer, including credit cards, for repaying debts.

**2. Description of Collection**

SSA uses Form SSA-1414 to process: (1) Credit card payments from former employees and vendors who have outstanding debts owed to the agency; (2) advance payments for reimbursable agreements; and (3) credit card payment for all *Freedom of Information Act (FOIA)* requests requiring payment. The respondents are former employees, and vendors who have outstanding debts to the agency; entities who have reimbursable agreements with SSA; and individuals who request information through *FOIA*.

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

Form SSA-1414 is available as a fillable PDF on SSA's website, which the respondent completes, prints, and mails to SSA. SSA allows payment online for those who choose to pay that way through Pay.gov (OMB Control No. 1545-0946). For those who choose not to use Pay.gov, we ask them to submit the payment using our paper Form SSA-1414 or the fillable PDF version. 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**

There are other credit card forms that collect similar information to the SSA-1414. However, each form is case or program specific, often involving different operating components and authorized by varying statutes and regulations. Therefore, there is no duplication of information.

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, SSA would not be able to process credit card payments from former employees; vendors who still owe debts to the agency; or from individuals requesting certain information through *FOIA*. 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*. However, in some situations, SSA may collect this information more often than quarterly if a debtor is using the form to make monthly payments.
  
8. **Solicitation of Public Comment and Other Consultations with the Public**  
The 60-day advance Federal Register Notice published on August 23, 2021, at 86 FR 47190, and we received no public comments. The 30-day FRN published on November 18, 2021 at 86 FR 64585. 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/maintenance 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.
  
11. **Justification for Sensitive Questions**  
The information collection does not contain any questions of a sensitive nature.
  
12. **Estimates of Public Reporting Burden**

<b>Modality of Completion</b>	<b>Number of Respondents</b>	<b>Frequency of Response</b>	<b>Average Burden per Response (minutes)</b>	<b>Estimated Total Annual Burden (hours)</b>	<b>Average Theoretical Hourly Cost Amount (dollars)*</b>	<b>Total Annual Opportunity Cost (dollars)**</b>

SSA-1414	6,000	1	2	200	\$27.07 *	\$5,414**
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\* 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](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.**

We base our burden estimates on current management information data, which includes data from actual interviews, as well as from years of conducting this information collection. Per our management information data, we believe that the average time in minutes listed in the chart above 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. The total burden for this ICR is **200** burden hours (reflecting SSA management information data), which results in an associated theoretical (not actual) opportunity cost financial burden of **\$5,414**. 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 **\$352,920**. This estimate accounts for costs from the following areas:

<b>Description of Cost Factor</b>	<b>Methodology for Estimating Cost</b>	<b>Cost in Dollars*</b>
Designing and Printing the Form	Design Cost + Printing Cost	\$1,500
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	\$348,000

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*
<b>Total</b>		<b>\$352,920</b>

\* 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.