

**Supporting Statement for
Wage Reports and Pension Information
20 CFR 422.122(b)
OMB No. 0960-0547**

A. Justification

1. Introduction/Authoring Laws and Regulations

Pension plan administrators annually file pension plan information with the Internal Revenue Service (IRS), who then forwards the information to the Social Security Administration (SSA). SSA maintains and organizes this information by plan number; plan participant name; and Social Security number. Under Section 1131(a) of the *Social Security Act (Act)*, pension plan participants are entitled to request this information from SSA. The Wage Reports and Pension Information Regulation, 20 CFR 422.122(b), of the *Code of Federal Regulations*, stipulates that before SSA disseminates this information, the requester must first submit a written request with identifying information to SSA.

2. Description of Collection

If individuals want to know if they have any private pension benefits due independent of their Social Security benefits, they call SSA to see if we have any information on file that SSA received from the IRS (via the IRS Form 8955-SSA), about any outstanding pension money the individuals may have from other sources. SSA informs the respondent that they will need to send us a request in writing, and lets them know where to send the information. In addition, SSA sends respondents a Potential Private Retirement Benefit Information letter upon their application for social security benefits that has the potential private retirement information we store from the IRS. If a respondents lose their letter from SSA, or have questions, it may trigger their request for wage reports and pension information. SSA uses the identifying information the requesters supply in writing to verify they are the individuals to whom the requested pension plan information pertains; and to locate the information needed to respond to inquiries. Once we confirm the requester's identity, we investigate the inquiry and furnish a response. The respondents are requestors of pension plan information.

3. Use of Information Technology to Collect the Information

Government regulations require us to provide Wage Reports and Pension Information to authorized individuals upon request. There is no standardized form for these inquiries because most requesters write or telephone their local SSA field office for this information. Due to the low number of respondents, we did not create an electronic method to collect this information nor do SSA employees enter the requests for pension information into an SSA Intranet system.

- 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 significantly 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 way of confirming the individuals requesting pension plan information are entitled to receive it. Eliminating this information collection could result in: (a) individuals receiving information to which they are not entitled, leading to potential fraud; or (b) SSA not providing pension plan information to requesters, thus failing to meet our legal obligations. 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 March 30, 2022, at 87 FR 18456, and we received no public comments. The 30-day FRN published on June 1, 2022, at 87 FR 33282. 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 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 we collect 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

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)*	Average Wait Time for Teleservice Centers (minutes) **	Total Annual Opportunity Cost (dollars)***
Requests for Pension Plan Information	580	1	30	290	\$28.01*	19**	\$13,277***

* 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).

** We based this figure by averaging the average FY 2022 wait times for teleservice centers, based on SSA’s current management information data.

*** 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 **30** minutes shown in our 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 **290** burden hours (reflecting SSA management information data), which results in an associated theoretical (not actual) opportunity cost financial burden of **\$13,277**. SSA does not charge respondents.

13. Annual Cost to the Respondents

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

14. Annual Cost to the Federal Government

The annual cost to the Federal Government is approximately \$1,384,240. This estimate accounts for costs from the following areas:

Description of Cost Factor	Methodology for Estimating Cost	Cost in Dollars*
Designing and	Design Cost + Printing Cost	\$0*

Printing the Form		
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	\$16,240
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	\$1,368,000
Total		\$1,384,240

* 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 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.

* **Note:** The total burden reflected in ROCIS is 474, while the burden cited in #12 above is 290. This discrepancy is because the ROCIS burden reflects the following components: telephone call system wait times. In contrast, the chart in #12 above reflects actual 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

SSA is not requesting an exception to publishing the OMB expiration date. (Because this information collection relates to unsolicited correspondence we receive from the public, displaying the OMB approval expiration date does not apply.)

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.