Supporting Statement for Form SSA-7004 Request for Social Security Statement 20 CFR 404.810 OMB No. 0960-0466

A. Justification

1. Introduction/Authoring Laws and Regulations

Section 205(c)(2)(A) of the Social Security Act (Act) requires the Commissioner of the Social Security Administration (SSA) to establish and maintain records of wages paid to, and amounts of self-employment income derived by, each individual, as well as the periods of earned wages, and such income derived. In addition, upon request, the Commissioner must inform any individual or their survivor of the periods during which employers paid those wages, or an individual derived such income. Section 1143(a)(2) of the Act requires the Commissioner provide, upon the request of an eligible individual, a Social Security Statement. 20 CFR 404.810 of the Code of Federal Regulations provides that an individual may make a written request to obtain a Statement of earnings or quarters of coverage, as shown in SSA records. SSA established Form SSA-7004 to fulfill the "written request" requirement.

2. Description of Collection

When an individual wants a Statement of earnings or quarters of coverage, as shown in SSA records, they can request it from SSA using Form SSA-7004. The SSA-7004 is available on our website for respondents to print, complete, and mail back to SSA. SSA uses the information from Form SSA-7004 to identify a respondent's Social Security earnings records; extract posted earnings information; calculate potential benefit estimates; produce the resulting Social Security Statements; and mail them to the requestors. The respondents are Social Security number holders requesting information about their Social Security earnings records and estimates of their potential benefits.

3. Use of Information Technology to Collect the Information

An individual may complete and mail Form SSA-7004 to SSA to obtain a Statement of Earnings or Quarters of Coverage. The fastest and most convenient way for a person to obtain their Statement is online, using a *my* Social Security

account. Form SSA-7004 provides the link toward the top of the first page, informing readers that they can get an immediate Statement online.

As mentioned above, respondents do have the option to use a *my* Social Security account to get an immediate statement online using a fully electronic means. SSA provides Form SSA-7004 as a service to those who do not wish to create a mySSA account.

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 use Form SSA-7004, individuals would not have a paper means to
submit a written request for copies of their earnings or quarters of coverage as
shown on SSA records. 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 June 30, 2022, at 87 FR 39153, and we received no public comments. The 30-day FRN published on September 20, 2022 at 87 FR 57551. 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 (minutes)	Estimated Total Annual Burden (hours)	Average Theoretical Hourly Cost Amount (dollars)*	Total Annual Opportunity Cost (dollars)**
SSA-7004	32,936	1	5	2,745	\$28.01*	\$76,887**

^{*} 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).

** 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 5 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. The total burden for this collection instrument is **2,745** burden hours (reflecting SSA management information data), which results in an associated theoretical (not actual) opportunity cost financial burden of **\$76,887**. 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 the Federal Government

The annual cost to the Federal Government is approximately **\$147,999**. This estimate accounts for costs from the following areas:

Description of Cost Factor	Methodology for Estimating	Cost in Dollars*
	Cost	
Designing and Printing the	Design Cost + Printing Cost	\$575
Form		
Distributing, Shipping, and	Distribution + Shipping +	\$0*
Material Costs for the Form	Material Cost	
SSA Employee (e.g., field	GS-9 employee x # of	\$147,424
office, 800 number, DDS	responses x processing time	
staff) Information Collection		
and Processing Time		
Full-Time Equivalent Costs	Out of pocket costs + Other	\$0*

	expenses for providing this	
	service	
Systems Development,	GS-9 employee x man hours	\$0*
Updating, and Maintenance	for development, updating,	
	maintenance	
Quantifiable IT Costs	Any additional IT costs	\$0*
Total		\$147,999

^{*} 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 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 When we last cleared this IC in 2019, the burden was 5,002 hours. However, we are currently reporting a burden of 2,742 hours. This change stems from a decrease in the number of responses from 60,026 to 32,936. The large decrease in responses is due to more people utilizing their mySSA accounts to request their statements online rather than completing paper Form SSA-7004. There is no change to the burden time per response. Although the number of responses changed, SSA did not take any actions to cause this change. These figures represent 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. <u>Collections of Information Employing Statistical Methods</u>

SSA does not use statistical methods for this information collection.