

Supporting Statement for Form SSA-7008
Request for Correction of Earnings Record
20 CFR 404.820 and 20 CFR 422.125
OMB No. 0960-0029

A. Justification

1. **Introduction/Authoring Laws and Regulations**
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. SSA uses Form SSA-7008 to collect the information necessary to carry out these procedures.
2. **Description of Collection**
Individuals alleging inaccurate earnings records in SSA's files use Form SSA-7008, or a personal interview during which SSA employees key their answers into our electronic Earnings Modernization Item Correction (ICOR) system, to provide the information SSA needs to check earnings posted, and, as necessary, initiate development to resolve any inaccuracies. The respondents are individuals who request correction of earnings posted to their Social Security earning records.
3. **Use of Information Technology to Collect the Information**
Neither the SSA-7008 nor the Intranet ICOR system allows for electronic submission by respondents as described in the Government Paperwork Elimination Act. However, earnings corrections for non-self-employment work can now be done electronically via the Online Request for Correction of Earnings Record (OMB No. 0960-0819) which can be accessed through [my Social Security](#). Earnings corrections for self-employed work, as well as certain complex cases (e.g. those requiring more than two types of documentation) cannot be conducted online and must still be submitted under this information collection. Based on our data, we estimate approximately 90% of respondents under this OMB number respond verbally to this collection via either an in-person interview in a field office or telephone interview with a 1-800 representative. Verbal responses are recorded directly into the ICOR by SSA Employee. Paper submissions of the SSA-7008 are mailed back to SSA, where SSA employee will input the information from the completed form SSA-7008 into ICOR.
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. **Consequences of Not conducting Information or Collecting it Less Frequently**

If we did not use Form SSA-7008, we would have no means of verifying an individual's earnings record 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 Circumstance**

There are no special circumstances that would cause SSA to collect this information 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 February 5, 2020, at 85 FR 6671, and we received no public comments. The 30-day FRN published on April 7, 2020 at 85 FR 19563. 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 of this form.

9. **Payment or Gifts to the Respondents**

SSA does not provide payment 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 in Field Office (minutes)***	Total Annual Opportunity Cost (dollars)**
SSA-7008	28,734	1	28	13,409	\$22.50*	24****	\$301,702**

In-person or telephone interview	337,500	1	20	112,500	\$22.50*	24***	\$ 2,531,250**
Totals	366,234			125,909			2,832,952**

* We based this figure on average U.S. worker’s hourly wages, as reported by Bureau of Labor Statistics 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 based this figure on the average FY 2020 wait times for field offices, based on SSA’s current management information data .

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In addition, OMB’s Office of Information and Regulatory Affairs (OIRA) is requiring SSA to use a rough estimate of a 30-minute, one-way, drive time in our calculations of the time burden for this collection. OIRA based their estimation on a spatial analysis of SSA’s current field office locations and the location of the average population centers based on census tract information, which likely represents a 13.97 mile driving distance for one-way travel. We depict this on the chart below:

Total Number of Respondents Who Visit a Field Office	Frequency of Response	Average One-Way Travel Time to a Field Office (minutes)	Estimated Total Travel Time to a Field Office (hours)	Total Annual Opportunity Cost for Travel Time (dollars)*****
366,234	1	30	183,117	\$4,120,133*****

*****We based this dollar amount on the Average Theoretical Hourly Cost Amount in dollars shown on the burden chart above.

Per OIRA, we include this travel time burden estimate under the 5 CFR 1320.8(a)(4), which requires us to provide “time, effort, or financial resources expended by persons [for]...transmitting, or otherwise disclosing the information,” as well as 5 CFR 1320.8(b)(3)(iii) which requires us to estimate “the average burden collection...to the

extent practicable.” SSA notes that we do not obtain or maintain any data on travel times to a field office, nor do we have any data which shows that the average respondent drives to a field office, rather than using any other mode of transport. SSA also acknowledges that respondents’ mode of travel and, therefore, travel times vary widely dependent on region, mode of travel, and actual proximity to a field office.

NOTE: We included the total opportunity cost estimate from this chart in our calculations when showing the total time and opportunity cost estimates in the paragraph below.

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 24 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 ICR is **125,909** burden hours (reflecting SSA management information data), which results in an associated theoretical (not actual) opportunity cost financial burden of \$ **6,953,085**. SSA does not charge respondents to complete our applications

13. Annual cost to the Respondents

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

14. Cost to the Federal Government

The annual cost to the Federal Government is approximately \$2,089,776. This estimate accounts for costs from the following areas: (1) designing, printing, and distributing the form; (2) SSA employee (e.g., field office, 800 number, DDS staff) information collection and processing time; and (3) systems development, updating, and maintenance costs.

15. Changes to the Public Reporting Burden

When we last cleared this IC in 2016, the burden was 62,500 hours. However, we are currently reporting a burden of 125,909 hours. This change stems from an increase in the completion time from 10 minutes to 28 for the paper form, and an increase from 10 minutes to 20 minutes for the personal interview. These figures represent current Management Information data.

* Note: The total burden reflected in ROCIS is 455,520, while the burden cited in #12 of the Supporting Statement is 125,909. This discrepancy is because the ROCIS burden reflects the following components: field office waiting time + a rough estimate of a 30-minute, one-way, drive burden. In contrast, the chart in #12 of the

Supporting Statement reflects actual burden.

16. **Plans for 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 will not use statistical methods for this information collection.