

**Supporting Statement for Electronic SSDI and SSI Wage Reporting:
myWageReport, SSA Mobile Wage Reporting, and Supplemental
Security Income Telephone Wage Reporting
20 CFR 404.1520(b), 404.1571-1576, & 404.1584-1593, 20 CFR
416.701-416.732
OMB No. 0960-0715**

A. Justification

1. Introduction/Authoring Laws and Regulations

The Social Security Administration (SSA) requires Social Security Disability Insurance (SSDI) beneficiaries or their representative payees to report when beneficiaries return to work, when their amount of work increases, or when their earnings increase. Similarly, SSA requires recipients of Supplemental Security Income (SSI), their deems, and representative payees to report changes in work and monthly wages. SSA allows SSDI beneficiaries, SSI recipients and deems, and representative payees to report earnings via electronic means, though the methods available depend on the type of benefits received. SSDI users may report wages using an Internet reporting system called myWageReport. In addition to myWageReport, SSI users have two other electronic options, the SSA Mobile Wage Reporting application (SSAMWR) and the SSI Telephone Wage Reporting System (SSITWR).

Statute and regulations authorize SSA to collect information about earnings and work. Sections 205(a) and Section 1631(d)(1) of the *Social Security Act (Act)* authorize the Commissioner of the Social Security Administration (SSA) to conduct quality review processes. Section 20 CFR 416.701-416.732 of the *Code of Federal Regulations (Code)* require SSI recipients to report changes such as, changes in income, resources, and living arrangements, which could affect the receipt and amount of their SSI payments. Section 223(d)(4) of the *Act* provides the Commissioner of SSA with the authority to provide regulations for administering the disability provisions of the law. The associated regulations are found in Sections 20 CFR 404.1520(b), 404.1571-1576, and 404.1584-1593 of the *Code*. Section 826 of the *Bipartisan Budget Act of 2015, P.L. 114-74*, requires SSA to offer SSDI beneficiaries similar electronic or automated receipt wage reporting methods available to SSI recipients. Section 202 of the *Social Security Protection Act (42 USC 902 of the United States Code)* requires SSA to issue receipts to SSI recipients, or their representatives, when they report wages.

2. Description of Collection

SSA receives yearly earnings information from employers (through our Integrated Registration Services (IRES) System, OMB No. 0960-0626). We also receive earnings information via data exchanges with the IRS and the Office of Child Support Enforcement (OCSE). However, we do not receive this information until many months after the individual worked and these sources do not provide monthly earnings information. To ensure proper payment, it is ultimately the

responsibility of the beneficiary or representative payee to report wage and employment information. To make wage reporting easier, SSA created several semi-automated and electronic methods through which beneficiaries may report.

myWageReport is a secure Internet reporting tool within the mySSA portal that enables SSDI beneficiaries, SSI recipients, and representative payees to submit pay stub information to SSA. For SSDI, SSA's system screens the myWageReport submission to determine the need for additional employment information. If the monthly earnings indicate that the individual completed the trial work period (TWP) or has substantial gainful activity (SGA) level earnings after the TWP, SSA systems alert the technician to conduct a work review to determine if the individual is performing SGA. The technician reaches out to beneficiaries or their representative payees, using Form SSA-821, Work Activity Report (OMB No. 0960-0059) to collect information about possible work incentives and non-work-related income. For SSI recipients, myWageReport calculates a monthly total for the wage submission and automatically sends the information to the appropriate record, preventing improper payments and virtually eliminating the need for manual intervention by SSA staff. It also generates a receipt for SSDI and SSI wage reports, thus providing confirmation that SSA received the earnings report.

SSAMWR is an application available for download on smartphones or other Android and iOS devices, which allows users to submit pay stub information in a similar manner to myWageReport. SSAMWR streamlines the wage reporting process using Optical Character Recognition and Intelligent Document Processing technologies. Users are able to upload pay stub images, which the app screens and transcribes to data fields for user review. These technologies reduce the number of entries respondents must manually enter. The SSITWR system is an automated 800 number, which allows users to submit monthly gross wage information by speaking their responses through voice recognition technology, or by keying in responses using a telephone keypad. To ensure the security of the information provided, SSAMWR and SSITWR ask respondents to provide information SSA can compare against our records for authentication purposes. Once the system authenticates the identity of the respondents, they can report their wage data. Both SSAMWR and SSITWR feed wage reports to SSA systems and generate a receipt for the report. We transmit SSI wages submitted via electronic reporting methods to the SSI system to immediately affect monthly payments without the need for SSA technician intervention.

Respondents submit reports generally on a monthly basis. SSA allows these individuals to report earnings via the electronic means above. However, respondents who prefer not to use electronic options are also able to use conventional methods to report wages. SSA accepts wage reports via calls to our 800 number, calls or visits to a local field office (FO), or mailing pay stubs and earnings information to local FOs. However, per our current management information data, a majority of respondents use the electronic options. The

respondents for this collection are SSDI beneficiaries, SSI recipients, SSI deemors, or representative payees.

3. Use of Information Technology to Collect the Information

We collect wage information electronically in accordance with the agency's Government Paperwork Elimination Act plan. The respondents initiate electronic wage reporting options from our website, an application, or via a toll-free 800 number.

myWageReport is available through SSA's public facing my Social Security account portal via the SSA website: www.socialsecurity.gov. The myWageReport application allows users to access the application on their desktop, laptop, or mobile device(s). We obtained OMB approval for the authentication for this service through SSA's Public Credentialing and Authentication Process (OMB No. 0960-0789). The SSAMWR application is available for free download in the Apple App and Google Play stores on smartphones or other Android and iOS compatible devices. Using myWageReport and SSAMWR, respondents provide information by making selections via dropdown boxes; radio buttons; and keying specific paystub information. Additionally, SSAMWR uses Optical Character Recognition and Intelligent Document Processing technologies to streamline the reporting process by using pay stub images to fill in data fields. The SSITWR system is an automated toll-free 800 number that uses voice recognition technology to receive and transmit wage reports to SSA. Respondents using SSITWR speak their gross wage total for the month into the telephone or use the telephone keypad to enter in the wage amount. We authenticate respondents through telephone speech technology authentication, covered under OMB No. 0960-0596. SSA receives the information we collect over secure channels. Accordingly, we estimate 100% of respondents under this OMB number use these electronic versions. We can also collect wage reports through mail; or in-person for those who cannot, or choose not to, submit wages using electronic methods. However, as mentioned above, our current data shows that a majority, if not all respondents for this collection, use the electronic versions.

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 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, or fail to collect it in a timely fashion, unreported work and wages would cause substantially more improper payments in both the SSDI and SSI programs. Not offering the electronic and semi-automated

methods to collect wage information described under this OMB Control number would leave the public with fewer options to comply with their reporting responsibilities. The public would need to report wages directly to SSA field offices, resulting in additional burden and processing delays. Additionally, if we did not use the myWageReport application, we would not comply with Section 826 of the Bipartisan Budget Act of 2015. Since 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 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 25, 2022, at 87 FR 44180, and we received no public comments. The 30-day FRN published on October 6, 2022, at 87 FR 60721. 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 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. Additionally, SSA protects and holds confidential the information it receives by adhering to our Internet Privacy Policy, which stipulates:

- The public does not need to give us personal information to visit our site;
- We collect personally identifiable information (name, social security number, date of birth, or e-mail) only if we know beneficiaries or their representatives provided it;
- We only use personal identifying information in conjunction with services beneficiaries requested at the time they submitted the information to us;
- We sometimes perform statistical analyses of user behavior in order to assess customer interest in the various areas of our site. We will disclose this information to third parties only in aggregate, never specific form;
- We never give, sell, or transfer any personal information to a third party.

We also take the following measures to ensure the confidentiality of applicants' personal information:

- We encrypt all electronic requests using the Secure Socket Layer (SSL) security protocol. SSL encryption prevents a third party from reading the transmitted data even if they intercept any data. This protocol is an industry standard used by banks such as Wells Fargo and Bank of America for Internet banking;
- We give applicants adequate warnings that the Internet is an open system, and there is no absolute guarantee others will not intercept and decrypt the personal information the applicants submitted. We advise applicants about alternative methods of requesting personal information, i.e., personal visit to a field office or a call to the 800 number;
- We will only allow requestors access to additional screens used for making changes to personal information or requests to SSA once we verify requestor identity.

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	Number of Responses	Average Burden Per Response (minutes)	Estimated Total Annual Burden (hours)	Average Theoretical Hourly Cost Amount (dollars)**	Total Annual Opportunity Cost (dollars)***
Training / Instruction*	108,280	1	108,280	35	63,163	\$19.86**	\$1,254,417****
myWageReport	3,557	12	42,684	7	4,980	\$19.86**	\$98,903****
SSITWR	16,341	12	196,092	5	16,341	\$19.86**	\$324,532****
SSAMWR	88,382	12	1,060,584	6	106,058	\$19.86**	\$2,106,312****
Totals	216,560		1,407,640		190,542		\$3,784,164****

* SSI respondents are completing training and a modality of collection. SSA is not able to break down the number of new wage reporters who receive training and longtime wage reporters who did not receive training; therefore, the actual number may be less than the estimate we provided. SSA collects management information data based on the number of transactions; we extrapolated the number of respondents from that number. We do not collect MI on unique reporters.

** We based this figure by averaging both the average DI payments based on SSA's current FY 2022 data (<https://www.ssa.gov/legislation/2022factsheet.pdf>), and 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 the **35, 7, 5, and 6** 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 **190,542** burden hours (reflecting SSA management information data), which results in an associated theoretical (not actual) opportunity cost financial burden of **\$3,784,164**. 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 **\$5,029,750**. 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	\$0*
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 administering participant training	\$1,616,981
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	\$3,084,212
Quantifiable IT Costs	Any additional IT costs	\$328,557
Total		\$5,029,750

* 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 132,283 hours. However, we are currently reporting a burden of 190,542 hours. This change stems from an increase in the number of responses from 1,339,000 to 1,364,956. In addition, we changed the completion time of the SSAMWR from 3 to 6 minutes as per our current management information data for the mobile application. Lastly, when we last cleared the IC for myWageReport in 2021, we reported the burden under OMB No. 0960-0808. However, we will now include the burden for myWageReport under this clearance package, which increased the overall burden accordingly. These figures represent current Management Information data.
- 16. Plans for Publication Information Collection Results**
SSA will not publish the results of the information collections.
- 17. Displaying the OMB Expiration Date**
SSA is not requesting an exception to the requirement to display the OMB expiration date.
- 18. Exception 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. Collection of Information Employing Statistical Methods

SSA does not use statistical methods for these information collections.