

**Supporting Statement for Changes to the Rules for Use of Electronic Payroll Data to
Improve Program Administration**
20 CFR 404.703(a)&(b); 404.1588(b)(3)(iii); 404.1588(b)(4); 416.708(c); 416.709
OMB No. 0960-0837

A. Justification

1. Introduction/Authoring Laws and Regulations

Introduction

This Information Collection Request (ICR) seeks Paperwork Reduction Act (PRA) approval for changes to multiple existing OMB-approved information collections (ICs) stemming from an associated final rule, *Use of Electronic Payroll Data to Improve Administration*. We previously solicited comment on these ICR changes when we published the Notice of Proposed Rulemaking (NPRM)¹ for this final rule. We responded to the comments requesting specific changes to the relevant ICs both in the “Comments and Responses” section of the final rule preamble, and in greater detail in the Addendum to this Supporting Statement.

Background

In summary, the final rule associated with this ICR will support proper use of information exchanges with payroll data providers that will help us administer our programs more efficiently, improve our customers’ experience, and prevent improper payments under titles II and XVI of the Act, which can otherwise occur when we do not receive timely and accurate wage and employment information.

Authoring Laws and Regulations

We administer the Old-Age, Survivors, and Disability Insurance (OASDI) disability and Supplemental Security Income (SSI) programs under *Titles II* and *XVI* of the *Social Security Act (Act)*, respectively. The OASDI program pays benefits to individuals who meet certain requirements, including being disabled and insured for disability. OASDI also pays benefits to certain members of disabled individuals’ families. We refer to meeting the requirements for OASDI disability benefits as OASDI disability “entitlement.” The SSI program provides financial support to: 1) adults and children with a disability or blindness; and 2) adults aged 65 and older. These individuals must meet all program eligibility requirements, including having resources and income below specified amounts. We refer to meeting the factors of eligibility for SSI payments as SSI “eligibility.”

We use wage and employment information to decide who can receive OASDI disability benefits and SSI payments. We also use it to determine SSI payment amounts. Currently, we rely on individuals to report certain wage and employment information to us. Individuals who are entitled to OASDI disability must report to us when their condition improves, when they return to work, when they increase the amount they work, and if their earnings increase. Receiving complete, accurate, and timely wage and

¹ [NPRM for Use of Electronic Payroll Data to Improve Program Administration.](#)

employment information allows us to administer our programs efficiently and to avoid improper payments that can occur when we do not have such information. Individuals who are entitled to OASDI disability, SSI, or deemors must report changes in income to SSA as soon as a reportable event happens. They can report these changes by phone, fax, mail, in person, or by using one of our electronic wage reporting options (OMB No. 0960-0715). We may also receive this information from payroll data providers in instances where we have authorization (OMB No. 0960-0807), or we may request it from the employer(s) through the SSA-L725 (OMB No. 0960-0034) or the SSA-L4201 (OMB No. 0960-0138) when the information we receive is incomplete or we are unable to obtain it from the individual. Because many individuals work in jobs where earnings may vary from week to week, some individuals report these changes to us each month or more frequently. Though we strive to make reporting as easy as possible, individuals must keep track of their reportable events, report them as soon as they happen, and spend time making the reports, which can be burdensome.

Section 824 of the *Bipartisan Budget Act of 2015 (BBA)*, Pub. L. 114-74, 129 Stat. 584, 607, authorizes the Commissioner of Social Security to enter into information exchanges with payroll data providers to obtain wage and employment information. It authorizes these information exchanges for the purposes of efficient program administration, and, to prevent improper OASDI disability and SSI payments without the need for additional verification. Section 824 adds a new section 1184 to the *Act* and also adds language to sections 225 and 1631(e) of the *Act* to clarify the role that information exchanges will play in determining payment amount and making eligibility and entitlement determinations and decisions for the OASDI disability and SSI programs. This information exchange would allow us to automate the process of obtaining and recording the wage and employment information we receive from a payroll data provider through the information exchange to the appropriate OASDI disability and SSI systems records. It would also allow us to use this information to make entitlement or eligibility determinations for the OASDI disability and SSI programs, adjust payment amounts, and avoid making improper payments based on the information we receive from a payroll data provider.

SSA published the Final Rule Making for the Use of Electronic Payroll Data to Improve Program Administration on December 31, 2024, which revises our regulations to include procedures for implementing the access to and use of the information held by payroll data providers. We expect these final rules will support proper use of information exchanges with payroll data providers, which will help us administer our programs more efficiently and prevent improper payments under *Titles II and XVI* of the *Act*, which can otherwise occur when we do not receive timely and accurate wage and employment information.

While we anticipate this rule will not require any major revisions to our existing information collections, the application of this rule will cause a burden change to our currently approved information collections under 0960-0715, Monthly SSI Wage Reporting (SSA's Mobile Wage Reporting, Telephone Wage Reporting, and Internet myWage Report application). In addition, we also note that we will need to update the listing of the *Code of Federal Regulation (CFR)* citations to include references to 20 *CFR*

703(a)&(b); 404.1588(b)(3)(iii) & (b)(4); 416.708(c); and 416.709 for the following ICRs: 0960-0034, Letter to Employer Requesting Information About Wages Earned by Beneficiary (SSA-L725); 0960-0138, Letter to Employer Requesting Wage Information (SSA-L4201); 0960-0715, Monthly SSI Wage Reporting (SSA’s Mobile Wage Reporting, Telephone Wage Reporting, and Internet myWage Report application); and 0960-0807, Authorization for the Social Security Administration to Obtain Wage and Employment Information from Payroll Data Provider (SSA-8240).

Upon OMB’s approval of the final rule, we will adjust the figures associated with the current information collection for these forms to reflect the new burden and will also update the documentation to include the new or revised CFR citations.

2. Description of Collection

Per section 824 of the BBA, which requires us to prescribe, by regulation, procedures for implementing the access to and use of the information held by payroll data providers, we are publishing this final rule. We expect this rule will support proper use of information exchanges with payroll data providers, which will help us administer our programs more efficiently and prevent improper payments under *Titles II* and *XVI* of the *Act*, which can otherwise occur when we do not receive timely and accurate wage and employment information.

As mentioned above, SSA already has existing OMB approved information collection tools relating to this rule. The relevant ICs include:

ICR Number	SSA Form Number and Name	Description of IC	Description of Respondents
0960-0034	SSA-L725, Letter to Employer Requesting Information About Wages Earned by Beneficiary	SSA uses Form SSA-L725 to request to request monthly earnings information from the applicant’s or recipient’s employer when SSA learns about potential work activities which an applicant or beneficiary performed and there is no other available evidence of earnings.	The respondents are businesses which employ Social Security disability applicants and recipients.
0960-0138	SSA-L4201, Letter to Employer Requesting Wage Information	SSA uses Form SSA-L4201 for wage verification in initial and post-entitlement (i.e. redetermination) claims; the form collects current and past wage data, any deductions for an employee’s participation in a cafeteria plan, and any garnishments for child support payments directly from employers.	Respondents are employers of SSI applicants and recipients.

ICR Number	SSA Form Number and Name	Description of IC	Description of Respondents
0960-0715	Monthly SSI Wage Reporting (SSA's Mobile Wage Reporting, Telephone Wage Reporting, and Internet myWage Report application.)	To ensure proper SSI payments, SSA requests the beneficiary or representative payee report wage and employment information on a monthly basis. To make wage reporting easier, SSA created several semi-automated and electronic methods through which beneficiaries may report.	The respondents for this collection are SSDI beneficiaries, SSI recipients, SSI deemors, or representative payees.
0960-0807	SSA-8240, Authorization for the Social Security Administration to Obtain Wage and Employment Information from Payroll Data Providers (Paper, Intranet, and Internet versions).	SSA uses Form SSA-8240 to secure the authorization we need from the relevant members of the public to obtain their wage and employment information from payroll data providers	The respondents are individuals who file for, or are currently receiving, SSDI or SSI payments, and any person whose income and resources SSA counts when determining an individual's SSI eligibility or payment amount.

Under the Notice of Proposed Rule Making the Use of Electronic Payroll Data to Improve Program Administration, we anticipate that fewer OASDI disability beneficiaries and SSI recipients will need to report their wages to us as we will be able to obtain that information directly from the payroll data providers. Therefore, we anticipate a reduction in use for the electronic wage reporting options under OMB No. 0960-0715.

To collect the necessary authorization for SSA to obtain the information from payroll data providers, we will use the Authorization for the Social Security Administration to Obtain Wage and Employment Information from Payroll Data Providers (0960-0807). While we previously obtained OMB approval for the new form under 0960-0807 to collect the authorization for the wage and employment information from payroll providers, SSA has not utilized this information through an automated exchange, because those exchanges have not, yet gone live. We do not anticipate any revision to the expected usage for the information collections under 0960-0807, as we believe the currently approved estimates for the information collection are still accurate. However, since the final rule provides additional information on OASDI disability and SSI reduced reporting requirements, as well as the effects of beneficiaries authorizing us to obtain records from payroll data providers, we will update the documentation under 0960-0807 to include the necessary information from the regulatory citations in the instructions for the information collections approved under 0960-0807.

In addition, we do not anticipate any revisions to the information collections under OMB Nos. 0960-0034 (SSA-L725) and 0960-0138 (SSA-L4201); however, we note that we will need to update the documentation for those information collections to include the revised CFR citations included in the proposed rule.

We identified the following psychological costs based on the requirements for this information collection:

- **Psychological Cost #1:**
 - **Requirement for the Program:** Under this final rule we are requesting respondents to authorize SSA to obtain records from payroll data providers.
 - **Psychological Cost:** The respondents may feel distrustful of the government and refuse to grant authorization, which is why this request is optional.
- **Psychological Cost #2:**
 - **Requirement for the Program:** Under these forms we request payment and financial information from the respondents.
 - **Psychological Cost:** The respondents may perceive this request to be invasive as it requests financial information. However, we need the financial information to assess the respondents needs under our OASDI and SSI programs.

We understand these psychological costs may cause respondents to delay their completion of these information collections or cause them to abandon the information collections entirely. However, we require full completion of these information collections to receive benefits. Therefore, we have taken these potential psychological costs into account when calculating our burden in #12 below.

Respondents are applicants for, or beneficiaries of, OASDI disability; applicants for, or recipients of, SSI; their representatives; or SSI deemors.

3. Use of Information Technology to Collect the Information

SSA collects wage reports from respondents using the modalities described above, including our current electronic mobile application and Internet myWage Report application, which we describe in further detail under OMB Control No. 0960-0715. We also ask for the Authorization for the Social Security Administration to Obtain Wage and Employment Information from Payroll Data Providers, which we discuss under OMB Control No. 0960-0807, in the pathing for our Internet Claim Application (iClaim) under OMB No. 0960-0618, and we allow respondents to provide authorization in person or via telephone at any time (with verbal attestation). While we do not currently have electronic versions of the Letter to Employer Requesting Information About Wages Earned by Beneficiary (SSA-L725, OMB Control No. 0960-0034); or the Letter to Employer

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Requesting Wage Information (SSA-L4201, OMB No. 0960-0138), we explain our reasoning in further detail under the specific OMB documentation for each of these information collections. The following chart shows the percentages of responses submitted via electronic means for each IC:

ICR Number	SSA Form Number and Name	Percentage of Electronic Responses
0960-0034	SSA-L725, Letter to Employer Requesting Information About Wages Earned by Beneficiary	100% submitted via USPS mail.
0960-0138	SSA-L4201, Letter to Employer Requesting Wage Information	100% submitted via the SSI Claim System (personal interview).
0960-0715	Monthly SSI Wage Reporting (SSA’s Mobile Wage Reporting, Telephone Wage Reporting, and Internet myWage Report application.)	100% submitted by the respondents via one of the electronic methods (Internet application, mobile application, automated telephone system)
0960-0807	SSA-8240, Authorization for the Social Security Administration to Obtain Wage and Employment Information from Payroll Data Providers (Paper, Intranet, and Internet versions).	96% submitted via the Intranet version, and 4% mail their responses via USPS mail.

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 significantly affect small businesses or other small entities.

6. Consequence of Not Collecting Information or Collecting it Less Frequently

If SSA did not collect wage reporting information through our various modalities under OMB No. 0960-0715, unreported work and wages would cause substantially more improper payments in both the OASDI and SSI programs. SSA collects the information on an as needed basis as described in the documentation for 0960-0715. If we did not use the letters and notices under OMB Nos. 0960-0034, and 0960-0138, we would not have the means to notify respondent of missing data. Finally, if we did not collect the authorization to obtain wage and employment information from payroll providers under 0960-0807, we would not be able to enact the requirements under this rule. As 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 Use of Electronic Payroll Data to Improve Program Administration (OMB No. 0960-0837) -

collection in a manner inconsistent with 5 CFR 1320.5.

8. Solicitation of Public Comment and Other Consultations with the Public

SSA published a notice of proposed rulemaking (NPRM) in the Federal Register on February 15, 2024, at 89 FR 11773. In response to the NPRM, members of the public submitted multiple comments regarding this regulatory change. The agency addressed the public comments we received in the preamble of the published final rule.

We published the final rule on December 31, 2024, at 89 FR 107236. If we receive any public comments on our time estimates or on the information collections associated with this rule, we will share them with 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

These information collections do not contain any questions of a sensitive nature.

12. Estimates of Public Reporting Burden

The charts below show the burdens for the information collections under this Information Collection Request (ICR).

The following chart shows the anticipated burden reduction due to the regulatory requirements from this rule:

OMB #; Form #; CFR Citations	Number of Respondents	Frequency of Response	Current Average Burden Per Response (minutes)	Current Estimated Total Burden (hours)	Anticipated New Number of Respondents Under Regulation	Anticipated New Burden Per Response Under Regulation (minutes)	Anticipated Estimated Total Burden Under Regulation (hours)	Estimated Burden Savings (hours)
0960-0034 – SSA-L725	170,000	1	40	113,333	170,000	40	113,333	0*
0960-0138 – SSA-L4201	133,000	1	30	66,500	133,000	30	66,500	0*
0960-0715 –	88,382	12	6	106,058	36,237	6	43,484	62,574**

OMB #; Form #; CFR Citations	Number of Respondents	Frequency of Response	Current Average Burden Per Response (minutes)	Current Estimated Total Burden (hours)	Anticipated New Number of Respondents Under Regulation	Anticipated New Burden Per Response Under Regulation (minutes)	Anticipated Estimated Total Burden Under Regulation (hours)	Estimated Burden Savings (hours)
Mobile Wage reporting 404.703(a) 416.708(c) 416.709 (new)								
0960-0715 – Telephone Wage reporting 404.703(a) 416.708(c) 416.709 (new)	16,341	12	5	16,341	6,700	5	6,700	9,641**
0960-0715 – myWage Report 404.703(a) 416.708(c) 416.709 (new)	3,557	12	7	4,980	1,458	7	2,041	2,939**
0960-0807 – SSA-8240 404.703(b) 404.1588(b) (3)(iii) 404.1588(b) (4)	150,000	1	8	20,000	150,000	8	20,000	0*
0960-0807 – MCS/SSI Claim System 404.703(b) 404.1588(b) (3)(iii) 404.1588(b) (4)	697,580	1	3	34,879	697,580	3	34,879	0*
0960-0807 – Internet 404.703(b) 404.1588(b) (3)(iii)	147,820	1	3	7,391	147,820	3	7,391	0*

OMB #; Form #; CFR Citations	Number of Respondents	Frequency of Response	Current Average Burden Per Response (minutes)	Current Estimated Total Burden (hours)	Anticipated New Number of Respondents Under Regulation	Anticipated New Burden Per Response Under Regulation (minutes)	Anticipated Estimated Total Burden Under Regulation (hours)	Estimated Burden Savings (hours)
404.1588(b) (4)								
Totals	1,406,680			369,482	1,342,795		294,328	75,154**

* This final rule will not significantly affect the burden for this information collection; therefore, we do not anticipate any burden reduction for this information collection due to the implementation of this rule.

** SSA is providing this figure as a current best estimate for burden reduction under this final rule. We will not have accurate data until we implement the rule.

The following chart shows the theoretical cost burdens associated with the final rule:

OMB #; Form #; CFR Citations	Anticipated New Number of Respondents	Estimated Burden Per Response from Chart Above (minutes)	Anticipated Estimated Total Burden Under Regulation (hours)	Average Theoretical Hourly Cost Amount (dollars)*	Average Combined Wait Time in Field Office and/or Teleservice Centers (minutes)**	Anticipated Annual Opportunity Cost (dollars)***
0960-0034 – SSA-L725	170,000	40	113,333	\$26.29*	0	\$2,979,525***
0960-0138 – SSA-L4201	133,000	30	66,500	\$26.29*	0	\$1,784,285***
0960-0715 – Mobile Wage reporting 404.703(a) 416.708(c) 416.709 (new)	36,237	6	43,484	\$22.39*	0	\$973,607***
0960-0715 – Telephone Wage reporting 404.703(a) 416.708(c) 416.709 (new)	6,700	5	6,700	\$22.39*	0	\$150,013***
0960-0715 – myWage	1,458	7	2,041	\$22.39*	0	\$45,698***

OMB #; Form #; CFR Citations	Anticipated New Number of Respondents	Estimated Burden Per Response from Chart Above (minutes)	Anticipated Estimated Total Burden Under Regulation (hours)	Average Theoretical Hourly Cost Amount (dollars)*	Average Combined Wait Time in Field Office and/or Teleservice Centers (minutes)**	Anticipated Annual Opportunity Cost (dollars)***
Report 404.703(a) 416.708(c) 416.709 (new)						
0960-0807 – SSA-8240 404.703(b) 404.1588(b)(3) (iii) 404.1588(b)(4)	150,000	8	20,000	\$22.39*	24**	\$1,791,200***
0960-0807 – MCS/SSI Claim System 404.703(b) 404.1588(b)(3) (iii) 404.1588(b)(4)	697,580	3	34,879	\$22.39*	21**	\$6,247,526***
0960-0807 – Internet 404.703(b) 404.1588(b)(3) (iii) 404.1588(b)(4)	147,820	3	7,391	\$22.39*	21**	\$1,323,876***
Totals	1,342,795		294,328			\$15,295,730***

* We based this figure on the average Payroll and Timekeeping Clerks hourly salary, as reported by the Bureau of Labor Statistics data (<https://www.bls.gov/oes/current/oes433051.htm>); as well as the averaging of DI payments based on SSA's current FY 2024 data (<https://www.ssa.gov/legislation/2024FactSheet.pdf>) and the average U.S. citizen's hourly salary, as reported by Bureau of Labor Statistics data (https://www.bls.gov/oes/current/oes_nat.htm).

** We based this figure on the average FY 2024 wait times for field offices and hearings office, as well as by averaging both the average FY 2024 wait times for field offices and 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 and from years of conducting this information collection, as well as anticipated changes due to the proposed rule. Per our management information data, we believe that the burdens per response for each form shown on the chart above accurately show the average burden per response for learning about the program; receiving notices as needed; reading and understanding instructions; gathering the data and documents needed; answering the questions and completing the information collection instrument; scheduling any necessary appointment or required phone call; consulting with any third parties (as needed); and waiting to speak with SSA employees (as needed). Based on our current management information data, the current burden information we provided is accurate. The total adjusted burden for this ICR is **294,328** burden hours (reflecting SSA management information data), which results in an associated theoretical (not actual) opportunity cost financial burden of **\$15,295,730**. SSA does not charge respondents to complete our applications.

As noted above, upon OMB approval of the final rule, we will update the burden figures in the associated information collections under 0960-0034, 0960-0138, 0960-0715, and 0960-0807 to reflect these revised burdens.

13. Annual Cost to the Respondents (Other)

These collections do not impose a known cost burden on the respondents.

14. Annual Cost To Federal Government

We estimated the annual cost to the Federal government for these forms under their individual OMB numbers. We are providing these figures again for informational purposes.

Description of Cost Factor	Methodology for Estimating Cost	Cost in Dollars Per ICR*
Designing and Printing the Form	Design Cost + Printing Cost	<ul style="list-style-type: none"> •0960-0034: \$185,000 •0960-0138: \$1,000 •0960-0715: \$0* •0960-0807: \$174
Distributing, Shipping, and Material Costs for the Form	Distribution + Shipping + Material Cost	<ul style="list-style-type: none"> •0960-0034: \$2,000 •0960-0138: \$8,000 •0960-0715: \$0* •0960-0807: \$2,786,619
SSA Employee (e.g., field office, 800 number, DDS staff) Information Collection and Processing Time	GS-9 employee x # of responses x processing time	<ul style="list-style-type: none"> •0960-0034: \$1,487,500 •0960-0138: \$1,995,000 •0960-0715: \$1,616,981 •0960-0807: \$
Full-Time Equivalent Costs	Out of pocket costs + Other expenses for providing this service	<ul style="list-style-type: none"> •0960-0034: \$0* •0960-0138: \$0* •0960-0715: \$0*

		•0960-0807: \$0*
Systems Development, Updating, and Maintenance	GS-12 employee x man hours for development, updating, maintenance	•0960-0034: \$0* •0960-0138: \$3,420 •0960-0715: \$3,084,212 •0960-0807: \$23,612
Quantifiable IT Costs	Any additional IT costs	•0960-0034: \$0* •0960-0138: \$0* •0960-0715: \$328,557 •0960-0807: \$0*
Total		•0960-0034: \$1,674,500 •0960-0138: \$2,007,420 •0960-0715: \$5,029,750 •0960-0807: \$2,810,405

* 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 Field Office employee (GS-11) who usually completes this form 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.

Note: We did not list these costs in ROCIS to avoid double counting the cost to the government. Rather, we only list these costs under their individual OMB numbers. However, we will not double-count them in ROCIS now, instead we include them only under their associated OMB-approved ICRs.

15. Program Changes or Adjustments to the Information Collection Request

This final rule decreases the overall public reporting burden for these information collections. See question #12 above for updated burden figures. As noted in #1 and #12 above, upon OMB approval of the final rule, we will update the burden figures in the associated information collections under 0960-0034, 0960-0138, 0960-0715, and 0960-0807 to reflect these revised burdens.

* Note: The total burden reflected in ROCIS is **650,218**, while the burden cited in #12 of the Supporting Statement is **294,328**. This discrepancy is because the ROCIS burden also reflects the field office and teleservices waiting time. In contrast, the chart in #12 of the Supporting Statement 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

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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.