Supporting Statement for Form SSA-7011-F4
Statement of Employer
20 CFR 404.801-404.803
OMB No. 0960-0030

A. Justification

1. Introduction/Authoring Laws and Regulations

Section *205(c)(2)(A)* of the *Social Security Act (Act)* charges the Commissioner with establishing and maintaining records of the amounts of wages SSA pays to individuals, and the amounts those individuals make in self-employment income. Section *205(d)* of the *Act* provides the authority for the Social Security Administration (SSA) to issue a subpoena if an employer refuses to furnish the requested information. Regulations at *20 CFR 404.801-404.802* of the *Code of Federal Regulations* describe the procedures SSA uses to implement Section *205(c)(2)(A)* of the *Act*. *20 CFR 404.803* explains that we may use our records and other evidence, such as a statement from an employer, to substantiate the amounts of earnings credited to an individual.

2. Description of Collection

In certain circumstances a worker may discover that their SSA earnings does not align with their paid wages. Workers typically discover this when they examine an earnings statement that does not match their expectations, such as when they are looking at an earning statement in conjunction with applying for benefits. When workers report they were paid wages, but cannot provide proof of those earnings, and the wages do not appear in SSA's records of earnings, SSA will work with the worker to develop the necessary evidence. Through Form SSA-7008 (OMB No. 0960-0029), SSA documents the worker's allegations regarding additional earned income. SSA then uses Form SSA-7011-F4 to contact the employer to document the alleged wages or otherwise work to resolve discrepancies in the individual's Social Security earnings record.

We only send Form SSA-7011-F4 to employers if we are unable able to locate the earnings information within our own records. The field office developing the claim will complete the first page of the form explaining the need for the information. In completing this information, the field office will typically provide additional context to the respondent including, for example:

- name and address of place of employment, if different than parent company;
- type of work;
- position/grade;
- shift;
- plant or project number;
- period of employment.

This is to ensure the employer reviews all their records without inadvertently constraining their search. SSA provides the relevant years of disputed earnings to the respondent of this form. If there is a discrepancy between the NH's allegation and the employer information on the SSA-7011-F4, then SSA recontacts the NH and informs them of the employer's information on the SSA-7011-F4. The purpose of the questions on the form is to request wage information from an employer in a claims and earnings discrepancy cases as evidence of non-agricultural wages.

The respondents are employers who can verify wage allegations made by wage earners.

3. Use of Information Technology to Collect the Information

Form SSA-7011-F4 is mailed to the respondents, and they complete it and mail it back to SSA with supporting documentation.

This collection does not currently have a fully public-facing Internet version, as we prioritized other information collections for full electronic conversions. Given that IT Mod programming is an ongoing, dynamic project, we cannot provide specific timelines for when we will be able to make any particular ICR available via Internet web-based application. We will ultimately convert most existing ICRs to full electronic versions depending on how they fall within our overall IT Mod schema, but this may be unconnected to the PRA approval lifecycle.

Per the risk assessment our OGC conducted on this form, we are not able to make the signature line on the form fillable at this time. However, we hope to convert this IC to a submittable PDF in the next 3-6 years, which will allow the public to utilize eSignature technology and to submit the form to us via the Internet. Unfortunately, we are not able to schedule this one for submittable PDF conversion, yet, but when we do so, we will submit a Change Request to OMB for approval prior to implementation.

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 we did not use Form SSA-7011-F4, it could result in incorrect payments or incorrect denials of benefits to the public. 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 July 2, 2021 at 86 FR 35371, and we received no public comments. The 30-day FRN published on September 2, 2021 at 86 FR 49403. 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-7011-F4	500	1	60	500	$27.07*	$13,535**

* 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#00-0000).

** 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 **60** 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 **500** burden hours (reflecting SSA management information data), which results in an associated theoretical (not actual) opportunity cost financial burden of **$13,535**. 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 $11,120. 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	$200
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	$7,500
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	$3,420
Quantifiable IT Costs	Any additional IT costs	$0*
Total		**$11,120**

* 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 so many employees have a hand in each aspect of our forms; therefore, 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 2018, the burden was 167 hours. However, we are currently reporting a burden of 500 hours. This change stems from an

increase in the completion time from 20 minutes to 60 minutes. After review of our burden estimate, we determined that 60 minutes more accurately represents completion time and is supported by 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. Collections of Information Employing Statistical Methods

SSA does not use statistical methods for this information collection.