

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 workers may discover their SSA earnings do 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 that employers paid their wages, but they cannot provide proof of those earnings, and the wages do not appear in SSA's records of earnings, SSA works with the workers 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.

SSA only sends 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 completes the first page of the form explaining the need for the information. In completing this information, the field office typically provides 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 the search, which is why SSA also provides the relevant years of disputed earnings to the respondent of this form. If there is a discrepancy between the worker's allegation and the employer information on the SSA-7011-F4, SSA recontacts the worker and informs that individual 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.

- **Psychological Cost**
 - **Requirement for the program:** SSA sends the SSA-7011-F4 to employers to provide evidence of wages earned and paid to the employee that is not in SSA records
 - **Psychological cost:** Employers may feel stress or resistance completing the SSA-7011-F4, because the employers may feel completing the form with missing wage information daunting if they do not have the wage records readily available to support an entry on the form. In addition, the employers may feel that SSA will penalize them for not complying in the annual wage reporting process for the employee who has the missing wages, or the employers may not have paid the related Federal Insurance Contributions Act (FICA) tax deposits to the IRS for the reporting period and is fearful of fines and penalties.

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

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

3. **Use of Information Technology to Collect the Information**

SSA mails the SSA-7011-F4 to the respondents, and the respondent completes the SSA-7011-F4, and mails or faxes it back to SSA with supporting documentation.

Form SSA-7011-F4 is available on SSA's website in a fillable PDF format. Once the employers complete the SSA-7011-F4, they print the form and mail it to SSA with supporting documentation. The respondents mail or fax the completed form to SSA (none of the respondents drop it off at a field office).

This collection does not currently have a fully public-facing Internet version, however; we are in the process converting this form for use through SSA's Upload Documents Portal (OMB No. 0960-0830). Upload Documents allows the

respondent to complete the fillable PDF and submit the information through the Upload Documents Portal. The submittable version mirrors the paper version and provides respondents with an online service option as an alternative to mailing, faxing, or bringing the form to an SSA field office. Use of the Upload Documents Portal does not require respondents to download and install the application locally on their device or pay any subscription or licensing fees, and we account for the burden for using Upload Documents under OMB No. 0960-0830. Once the electronic submission version of the form is ready for implementation, 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 April 4, 2025, at 90 FR 14891, and we received no public comments. The 30-day FRN published on June 17, 2025 at 90 FR 25734. 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 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

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	750	1	30	375	\$32.66*	\$12,248**

* We based this figure on average U.S. worker's hourly wages, as reported by Bureau of Labor Statistics data ([Occupational Employment and Wage Statistics](#)).

** 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 calculated the following Learning Cost time burden based on the estimated time and effort we expect respondents will take to learn about this program, its applicability to their circumstances, and to cover any additional research we believe respondents may need to take to understand how to comply with the program requirements (beyond reading the instructions on the collection instrument):

***We based this dollar amount on the Average

Total Number of Respondents	Frequency of Response	Estimate Learning Cost (minutes)	Estimated Total Annual Burden (hours)	Total Annual Learning Cost (dollars)**
750	1	30	375	\$12,248***

Theoretical Hourly Cost Amount in dollars shown on the burden chart above.

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 **30** minutes accurately shows 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 burden for this ICR is **375** burden hours (reflecting SSA management information data), which results in an associated theoretical (not

actual) opportunity cost financial burden of **\$24,496**. 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 **\$17,225**. 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	\$13,605
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		\$17,225

* 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 2022, the burden was 250 hours. However, we are currently reporting a burden of 375 hours. This change stems from an increase in the completion time from 20 minutes to 30 minutes. After review of our burden estimate, we determined that 30 minutes more accurately represents completion time, based on current Management Information data.

* **Note:** The total burden reflected in ROCIS is 375, while the burden cited in #12 of the Supporting Statement is 750. This discrepancy is because the ROCIS burden reflects learning costs. 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

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.