Supporting Statement for
Wage Reports and Pension Information
20 CFR 422.122(b)
OMB No. 0960-0547

A. Justification

1. Introduction/Authoring Laws and Regulations

Pension plan administrators annually file plan benefit information with the Internal Revenue Service, which then forwards the information to the Social Security Administration (SSA). SSA maintains and organizes this information by Social Security number holder record, plan participant's name, and plan number. Per section *1131(a)* of the *Social Security Act (Act)* pension plan participants are entitled to request pension plan benefit information from SSA. The Wage Reports and Pension Information regulation, *20 CFR 422.122(b)* of the *Code of Federal Regulations*, stipulates that before SSA disseminates this information, the requestor must first submit a written request with identifying information to SSA. If the request meets our requirements, SSA will supply the type, payment frequency, and amount of the pension benefit on record, as well as the name and address of the plan administrator (as reported to IRS and forwarded to us).

SSA collects this information to meet statutory requirements and ensure that only authorized individuals receive pension information. Since 1948, SSA has provided earnings-record information to private pension plan administrators to help them determine pension eligibility and benefit amounts. The *Employee Retirement Income Security Act of 1974 (ERISA), Pub.L. 93-406* expanded SSA's responsibilities by requiring the Agency to obtain IRS-reported information on participants with vested pension benefits and notify certain Title II and Title XVIII claimants of pension information in SSA's records.

2. Description of Collection

If individuals want to know if they have any outstanding private pension benefits due to them, independent of their Social Security benefits, they contact SSA to request that information. SSA informs the respondents that they need to send us a request in writing and lets the respondents know how and where to send that request. In addition, SSA sends respondents a Potential Private Retirement Benefit Information letter upon their application for social security benefits that has the potential private retirement information we store from the IRS.

SSA collects written requests for pension plan information to comply with statutory requirements and provide information only to entitled individuals. SSA requires the requestors to submit the following information as part of this request:

- Name,
- Social security number,
- Date of birth, and
- Any information the requestor may have concerning the name of the pension plan

involved and the month and year coverage under the plan ended;
- The name and address of the person to whom the information is to be sent; and
- The requester's signature under the following statement:
  "I am the individual to whom the information applies (or "I am related to the individual as his or her _____"). I know that if I make any representation which I know is false to obtain information from Social Security records, I could be punished by a fine or imprisonment or both."

Participation is voluntary, and SSA only accepts requests via paper submissions. SSA employees use the identifying information provided to verify the requester's identity, locate relevant pension records, and respond to the inquiry. If the request meets our requirements, SSA supplies the type, payment frequency, and amount of the pension benefit on record, as well as the name and address of the plan administrator (as reported to IRS and forwarded to us).

Individuals may learn about potential private pension benefits when they contact SSA or when SSA sends a Potential Private Retirement Benefit Information letter after they apply for Social Security benefits. SSA receives the pension information from the IRS through IRS Form 8955-SSA (OMB No. 1545-2187). Individuals who lose the letter, have questions about it, or want to determine whether SSA has information about potential private pension benefits must submit that in their written requests. Once SSA receives the written request, we verify the requester's entitlement, review the inquiry, and furnish the appropriate response.

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

Psychological Cost #1:

- **Requirement for Program:** We require respondents to send a written request that includes identifying information, as well as information regarding the pension plan involved and the month and year coverage under the plan ended, plus a perjury statement.

- **Psychological Cost:** Some respondents may feel daunted by the amount of information we are requesting, or that we are requesting they submit this information to us in writing and do not accept electronic submissions.

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 receive benefits. Therefore, we have taken this potential psychological cost into account when calculating our burden in #12 below. In addition, as this collection is voluntary, we have not received any feedback regarding these potential psychological costs.

The respondents are individuals requesting information about their pension plan benefits.

3. Use of Information Technology to Collect the Information

This collection is paper-only, as there is no standardized form for these inquiries, and we require the respondents to submit minimal personally identifiable information, therefore, we cannot accept these requests via email. Most individuals contact their local SSA field office by telephone or submit a written request by mail. There is no in-office interview nor do SSA employees enter the requests for pension information into an SSA electronic system. Due to the low volume of requests, SSA has not developed an electronic submission option, fillable or submittable PDF, or internal electronic data-entry system for this collection. However, SSA will reassess electronic options as technology advances.

In the interim, we evaluated this collection for electronic submission of the current paper form. Given the high volume of forms we are coordinating for electronic submission, and the more urgent nature of some of our higher volume forms, we ultimately decided not to prioritize this ICR for electronic submission at this time. When we are able to schedule this form for electronic submission, we will submit a Change Request to OMB to request prior approval.

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. Consequence of Not Collecting Information or Collecting it Less Frequently

If we did not collect this information, we would have no way of confirming the individuals requesting pension plan information are entitled to receive it. Eliminating this information collection could result in: (a) individuals receiving information to which they are not entitled, leading to potential fraud; or (b) SSA not providing pension plan information to requesters, thus failing to meet our legal obligations. 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 August 27, 2026, at 91 FR 55421, and we received no public comments. The 30-day FRN published on October 29, 2026, at 91 FR 68213. 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 development 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

Please see the burden chart below:

Method of Completion	**Number of Respondents**	**Frequency of Response**	**Average Burden Per Response (minutes)**	**Estimated Total Annual Burden (hours)**	**Average Theoretical Cost Amount (dollars)***	**Average Teleservice Answer Time (minutes)****	**Total Annual Opportunity Cost (dollars) *****
Requests for Pension Plan Information	178	1	30	89	$ 33.54 *	1**	$3,086***

* We based this figure on an average U.S. citizen's hourly salary ($33.54), as reported by Bureau of Labor Statistics data (Occupational Employment and Wage Statistics).

**We based this figure on the FY 2026 answer times for the teleservice centers (1 minute, which represents the average time it takes for a call to be picked up automatically by our systems and then routed to an SSA technician). This figure reflects data from our systems and the data posted on our public facing website (Social Security performance | SSA) on the date we drafted this document. As the figures fluctuate, the wait times may be different on the website than they appear here. We did not include an in-office wait time, as respondents who choose to submit this request in writing typically do so by mail.

*** This figure does not represent actual costs that SSA is imposing on individuals; rather, these are theoretical opportunity costs for the additional time respondents will spend to complete the information collection. **There is no actual charge to respondents to complete the information collection.**

We did not include travel time as per our current management information data, since the majority of respondents who complete the paper forms return them to us via mail (see #3 above). Should this change in the future, we will include the language and chart for

travel time to a field office.

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):

Total Number of Respondents	**Frequency of Response**	**Estimate Learning Cost (minutes)**	**Estimated Total Annual Burden (hours)**	**Total Annual Learning Cost (dollars)******
178	1	15	45	$1,509****

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

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 **30** 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 **89** burden hours (reflecting SSA management information data), which results in an associated theoretical (not actual) opportunity cost financial burden of **$4,595**. 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 **$6,707**. 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	$150
Distribution, Shipping, and Material Costs for the Form	Distribution + Shipping + Material Cost	$2,000
SSA Employee (e.g., field office, 800 number, DDS staff) Information Collection	GS-9 employee x # of responses x processing time	$1,137

and Processing Time		
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		**$6,707**

* 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 cleared this ICR in 2023, the burden was 290 hours. However, we are currently reporting a burden of **89** hours. This reduction results from the Department of Labor's (DOL) creation of the Lost and Found Pension Registry, which allows plan participants to search for and locate pension information that the IRS reports to SSA and that SSA shares with DOL for use in the Registry. There is no change to the burden time per response. Although the number of responses changed, SSA did not take any actions to cause this change. These figures represent current Management Information data.

*Note: The total burden reflected in ROCIS is **136**, while the burden cited in #12 of the Supporting Statement is **89**. This discrepancy is because the ROCIS burden reflects the telephone call system wait time and learning cost. In contrast, the chart in #12 above 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

SSA is not requesting an exception to the requirement to display the OMB approval expiration date.

.

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. <u>Collections of Information Employing Statistical Methods</u>

SSA does not use statistical methods for this information collection.