Supporting Statement for
Certification of Prisoner Identity Information
20 CFR 422.107
OMB No. 0960-0688

A. Justification

1. Introduction/Authoring Laws and Regulations

Section *205(c)(2)(B)* of the *Social Security Act (Act)* authorizes the assignment of Social Security numbers (SSN). The Social Security Administration (SSA) regulations at *20 CFR 422.107* of the *Code of Federal Regulations* specify an applicant must provide documentary evidence of identity when applying for an original or replacement Social Security card. Section *702* of the *Act* authorizes SSA to establish rules and regulations appropriate to carry out the functions of the administration.

2. Description of Collection

SSA collects the information needed to assign SSNs and issue original, replacement, or corrected Social Security cards. SSA uses SSNs to maintain accurate earnings records and to accurately pay benefits under the Social Security program. Individuals incarcerated in Federal, State, or local public or private correctional facilities may need a Social Security card to verify their SSN for school or work programs or to demonstrate employment eligibility upon release.

Before issuing a replacement Social Security card, SSA requires applicants to provide proof of identity. Individuals who have been incarcerated for extended periods often do not have current identity documents. Therefore, under a formal written agreement with a correctional institution, SSA permits prison officials to verify the identities of certain incarcerated U.S. citizens who need replacement Social Security cards and are approaching release.

When an inmate completes and signs Form SS-5 (OMB No. 0960-0066), Application for a Social Security Card, SSA allows the inmate to request a prison official to certify the inmate's identity using information from the inmate's official file in lieu of providing current identity documents. Prison officials then submit the inmates' certified identity information by mail on correctional facility letterhead, as SSA does not use a standardized form to collect it. SSA uses the information to establish the inmate's identity during the replacement Social Security card process.

Based on the certification requirements, this collection does not appear to impose psychological costs on the inmate as an applicant for an SSN replacement card. The applicant completes Form SS-5, and an authorized prison official reviews the applicant's official prison record and certifies the accuracy of specified identifying information. The certification process does not require the applicant to provide additional sensitive information directly to the certifying official beyond the information already maintained in the official prison record. Therefore, SSA does not expect the collection to cause psychological burden, anxiety, or other adverse psychological effects beyond those

ordinarily associated with applying for a replacement Social Security card.

In addition, since the prison officials certify the inmates' identities through a prior formal written agreement, we have received no comments regarding any psychological costs on the prison officials for submitting this information to SSA on the correction facility letterhead. Rather, prison officials consider this as a task which is part of the written agreement with SSA. Therefore, we do not have psychological costs associated with this information collection.

The respondents are prison officials who certify the identities of incarcerated individuals applying for replacement Social Security cards.

3. Use of Information Technology to Collect the Information

We do not currently allow for the transmission of this data via email, due to the sensitivity of the information for which we are requesting certification. As we are requesting the prison officials send us verification of personally identifying information for the prisoners, we cannot allow for the transmission of this information via email, as email is not a secure means to transmit this data. SSA maintains a list of secure email partners, and, if the respondents wish to submit the information via email to SSA, we can work with them to verify their institutional email is secure and to add them to our secure email partners list.

Creating a fully electronic option would require SSA to develop a secure system that allows prison officials to transmit and certify the accuracy of specified personally identifiable information. While we are considering ways to make this information collection, and others like it, electronic; at this time, we have prioritized other, higher volume forms for electronic implementation. 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. Finally, as there is no standardized form for this collection, we are unable to create a submittable PDF version of this information collection.

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 SSA did not collect this information, we would have no way to verify the identities of incarcerated applicants requesting replacement Social Security cards. This could create hardship for applicants who typically do not have the current documents SSA requires to prove their identities. Because we request 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 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 September 24, 2026, at 91 FR 60685, and we received no public comments. The 30-day FRN published on November 25, 2026, at 91 FR 76295. 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**	**Number of Responses**	**Average Burden Per Response (minutes)**	**Estimated Total Annual Burden (hours)**	**Average Theoretical Cost Amount (dollars)***	**Total Annual Opportunity Cost (dollars) *** **
Verification of Prisoner Identity Statements	1,000	200	200,000	3	10,000	$30.59*	$305,900**

* We based this figure on an average Correctional Officer's and Jailers' hourly wages ($30.59), 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 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 because, according to our current management information data, respondents who complete the Certification of Prisoner Identity Information, return it to us by mail only. If this process changes in the future, we will include language and a chart addressing travel time to a field office.

We do not anticipate any learning costs associated with this information collection. The Memorandum of Understanding (MOU) between the Department of Corrections and SSA provides correctional facility staff with clear, step-by-step procedures for requesting a replacement Social Security card on an inmate's behalf and defines SSA employees' responsibilities for processing the request. Any limited learning involved is procedural and covered by the MOU. The only related cost is staff time for training and verification activities required to carry out the established procedures.

We base our burden estimates on current management information data, which includes years of conducting this information collection. Per our management information data, we believe that **3** 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 **10,000** burden hours (reflecting SSA management information data), which results in an associated theoretical (not actual) opportunity cost financial burden of **$305,900**. 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 **$198,707**. 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	$0**
Distribution, 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	$198,707

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	0****
Quantifiable IT Costs	Any additional IT costs	$0*
Total		**$198,707**

* We have inserted a $0 amount for cost factors that do not apply to this collection.

** Because this collection does not use a standardized form, we incur no form design or printing costs. Therefore, we report $0 in costs.

***Respondents submit and mail the information on correctional facility letterhead, so the federal government incurs no cost.

**** Because SSA does not maintain online submission instructions or systems for prison officials, SSA incurs no related maintenance costs. SSA contacts prison officials directly when it needs information and provides submission instructions at that time. If SSA updates the information collection, SSA will report the associated maintenance costs at that time.

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 our technicians process several forms at once, and the time it takes to do so can vary greatly per respondent. Also, 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
There are no changes in the public reporting 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 an 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. Collections of Information Employing Statistical Methods

SSA does not use statistical methods for this information collection.