

**Supporting Statement for Form SSA-7008
Request for Correction of Earnings Record
20 CFR 404.820 and 20 CFR 422.125
OMB No. 0960-0029**

A. Justification

1. *Sections 205(c) (4)-(5) of the Social Security Act* state that the Commissioner of the Social Security Administration (SSA) may correct or amend the earnings records of individuals if necessary. *Sections 20 CFR 404.820 and 20 CFR 422.125 of the Code of Federal Regulations* establish the procedures and policies for correcting individuals' earnings records. Form SSA-7008 is used to collect the information necessary to carry out these procedures.
2. When an individual requests a correction of his/her earnings record, the Social Security Administration (SSA) must verify the record against all other data previously received for this individual. Form SSA-7008, which collects all the information needed to do so, is used by SSA for this purpose. The respondents are individuals who request correction of earnings posted to their Social Security earnings record.
3. SSA has implemented an improved electronic system (Earnings Modernization Item Correction – ICOR) that permits the majority of the requests for correction of an individual's earnings record to be taken via the telephone or through a personal interview. The information is input directly into the system. Only in those cases where the individual is not in the local office for direct questioning or telephones the 800 number or field office directly, is the Form SSA-7008 forwarded to the individual for completion. The implementation of the electronic ICOR system has not resulted in a reduction to the overall burden. SSA estimates that 90% of the information is collected using ICOR.
4. The nature of the information being collected and the manner in which it is collected preclude duplication. There is no other collection instrument used by SSA that collects data similar to that collected here.
5. This collection does not impact small businesses or other small entities.
6. If the information documented by Form SSA-7008 was not collected, SSA would have no means of verifying an individual's earnings record when the veracity of SSA's records are in question. Thus, SSA could potentially have inaccurate earnings records for a worker, which would lead to the worker receiving improper Social Security benefits (overpayment or underpayment) at the end of the worker's career. Because form SSA-7008 is only completed when an individual questions SSA's records, it cannot be completed less frequently. There

are no technical or legal obstacles that prevent burden reduction.

7. There are no special circumstances that would cause this information collection to be conducted in a manner that is not consistent with 5 CFR 1320.5.
8. The 60-day advance Federal Register Notice was published on August 7, 2007 at 72 FR 44211, and SSA received no public comments. The 30-day advance Federal Register Notice was published on October 18, 2007 at 72 FR 59132, and SSA received no public comments. There have been no outside consultations with members of the public.
9. SSA provides no payment or gifts to the respondents.
10. The information requested is protected and held confidential 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. The information collection does not contain any questions of a sensitive nature.
12. The form SSA-7008 will be used by approximately 375,000 respondents annually. The average estimated completion time is 10 minutes. This results in an annual estimated burden of 62,500 hours. Approximately 37,500 respondents will use the paper version of the form and 337,500 respondents will complete the form via a telephone or in person interview which will be input directly in the ICOR Earnings Modernization System as seen on the chart below.

	Number of Respondents	Frequency of Response	Estimated Burden per Response	Estimated Annual Burden
Paper Version	37,500	1	10 minutes	6,250 hours
ICOR	337,500	1	10 minutes	56,250 hours
Total	375,000			62,500 hours

The total burden is reflected as burden hours, and no separate cost burden has been calculated.

13. There is no known cost burden to the respondents.
14. The annual cost to the Federal Government is approximately \$1,051,400. This estimate is a projection of the costs for printing and distributing the collection instrument and for collecting the information. We estimate that the ICOR information will be collected by claims representatives at an approximate hourly rate of \$18, for a total of \$1,046,250. The remainder of the estimated cost is for processing the paper SSA-7008.
15. There is no change in the number of respondents or the Annual Burden Hours.

16. The results of the information collection will not be published.
17. OMB has granted SSA an exemption from the requirement that the expiration date for OMB approval be printed on its program forms. SSA produces millions of public-use forms, many of which have a life cycle longer than that of an OMB approval. SSA does not periodically revise and reprint its public-use forms (e.g., on an annual basis). This exemption was granted so that otherwise useable editions of forms would not be taken out of circulation because the expiration date had been reached. In addition, Government waste has been avoided because stocks of forms will not have to be destroyed and reprinted.
18. 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

Statistical methods are not used for this information collection.