# Supporting Statement for Government to Government Services Online (GSO) Website Registration, Government to Government Services Online Website Account Modification/Deletion Form 20 CFR 401.45 OMB No. 0960-0757

#### A. <u>Justification</u>

#### 1. Introduction/Authoring Laws and Regulations

Section (f) (2) - (3) requires agencies to establish requirements for identifying an individual who requests a record or information pertaining to that individual and to establish procedures for disclosure of personal information.

The Social Security Administration (SSA) collects this information by authority of *Section 5 USC 552a (e) (10)* of the *Privacy Act of 1974*, which requires agencies to establish appropriate administrative, technical, and physical safeguards to ensure the security and confidentiality of records.

Section 20CFR 401.45 of the Code sets the guidelines for identifying identify.

SSA promulgated Privacy Act rules in the *Code of Federal Regulations*, *Subpart B.* Procedures for verifying identity are at *20 CFR 401.45*.

#### 2. **Description of Collection**

The Government-to-Government Services Online (GSO) web site allows various external organizations to submit files to a variety of SSA systems and, in some cases, receive return files. The SSA systems that process data transferred via Government-to-Government services include, but are not limited to, systems responsible for disability processing and benefit determination or termination.

SSA uses the information to register the requestor to use the GSO website. The requestor is already a known entity to a sponsor within SSA. The sponsor completes the registration forms based on information provided by the requestor and emails them to the User Interface Team (UIT)

Prior to using GSO for the first time, the field office (FO) completes the left side of Form SSA-159, and emails the form to the Sponsor who is a SSA employee at an intermediate level.

The sponsor receives Form SSA-159 (Government-to-Government Services Online Website Registration Form), makes sure the form is complete and valid, completes the right side of the form, and emails to the User Interface Team (UIT).

The UIT creates the user's account based on the information on the form. The Sponsor provides the user with account information, and conducts a walkthrough of the Government-to-Government Services website as necessary. If an estab-

lished organization needs to add additional users, the Sponsor is responsible for submitting a form for the additional users.

The requesting organization can also modify its online account (e.g., address change) by completing an online form, SSA-160 (Government to Government Service Online Website Account Modification/Deletion Form). Respondents are state/local government agencies, other Federal agencies, and some private sector business entities.

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

SSA did not create an electronic version of Form SSA-159 under the agency's Government Paperwork Elimination Act (GPEA) plan because only 25,000 respondents complete the form. This is less than the GPEA cut-off of 50,000.

In accordance with the agency's GPEA plan, SSA created an Internet version of Form SSA-160. Based on our data, we estimate approximately 100% of respondents under this OMB number use the electronic version.

#### 4. Why We cannot Use Duplicate Information

The nature of the information we are collecting and the manner in which we are collecting 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 use Form SSA-159 and Form SSA-160, we would have no way to verify the requester's identity or modify online account information, which would result in SSA's not being able to respond to these Internet requests. Because we only collect the information 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 May 13, 2010, at 75
FR 27036, and we received no public comments. SSA published the second
Notice on August 02, 2010 at 75 FR 45190. If we receive comments in response
to the 30-day Notice, we will forward them to OMB. We did not consult with the
public on the revision/maintenance of this application.

Note: The first Federal Register Notice shows incorrect form name. Under the

new moniker, it is now the Government-to-Government Services Online (GSO) Website Registration, Government-to-Government Services Online Website Account Modification/Deletion Form. Form SSA-118 is now Form SSA-159 (GSO Website Registration Form) and Form SSA-119 is now Form SSA-160 (GSO Website Account Modification/Deletion Form). The 30-day Notice reflects the correct nomenclature.

We did not consult with the public on the maintenance of this form or application.

#### 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

Form	Number of Respondents	Response Time (minutes)	Burden (hours)
SSA-159			
	925	15	231
SSA-160			
	2500	15	625
Totals	3425		856

The total burden for this ICR is 856 hours. This figure represents burden hours, and we did not calculate a separate cost burden.

#### 13. Annual Cost to the Respondents (Other)

This collection does not impose a known cost burden to the respondents.

#### 14. Annual Cost To Federal Government

The estimated cost to the Federal Government to collect the information is negligible. Because the cost of maintaining the system which collects this

information is accounted for within the cost of maintaining all of SSA's automated systems, it is not possible to calculate the cost associated with just one Internet application.

## 15. **Program Changes or Adjustments to the Information Collection Request**There has been an increase in the number of respondents using Form SSA-160, because more respondents are making modifications to their accounts.

### 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. <u>Collection of Information Employing Statistical Methods</u>

SSA does not use statistical methods for this information collection.