

Supporting Statement for Form SSA-120
Application for Access to SSA Systems
20 CFR 401.45
OMB No. 0960-NEW

A. Justification

1. Introduction/Authoring Laws and Regulations

Section 205 (a) of the Social Security Act (the Act) provides the Commissioner of Social Security with the authority to establish procedures for verifying identity. 20 CFR 401.45 of the *Code of Federal Regulations*, Subpart B provides procedures for verifying identity.

The Social Security Administration (SSA) collects this information by authority of the *Privacy Act of 1974* at 5 U.S.C. 552A (e)(10), which requires agencies to establish appropriate administrative, technical, and physical safeguards to ensure the security and confidentiality of records. Sub-section, 5 U.S.C. 552A (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.

Executive Order 10450 authorizes the collection of the data SSA requires on form SSA-120. In addition, specific authority for use of Social Security Numbers is contained in Executive Order 9397, 26 CFR 31.6011(b)2, and 26 CFR 31.6109-1.

2. Description of Collection

SSA uses Form SSA-120 to allow authorized users to apply for access to SSA's information systems. SSA requires Supervisor approval and local or component Security Officer review prior to granting access. The respondents are SSA employees and non-Federal Employees (contractors) who require access to SSA systems to fulfill their jobs. **Note:** Because SSA employees are Federal workers exempt from the requirements of the PRA, the burden is only for SSA contractors.

3. Use of Information Technology to Collect the Information

Form SSA-120 is available as a print-only PDF on SSA's website. SSA did not create an electronic version of Form SSA-120 under the agency's Government Paperwork Elimination Act (GPEA) plan because only 4,313 respondents complete the form. This is less than the GPEA cut-off of 50,000.

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-120, we would not have a way to track individual's systems access to Information Systems and Resources. We would not be able to assure the confidentiality integrity, and availability of its Information Technology Resources.

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 09, 2011, at 76 FR 55999, and we received no public comments. The 30-day FRN published on November 28, 2011, at 76 FR 72994. 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 of this application.

- 9. Payment or Gifts to Respondents**
SSA does not provide payments or gifts to the respondents.

- 10. Assurances of Confidentiality**
SSA will not make any disclosure of this information to agencies or individuals outside this department unless required by law or written consent accompanies the request

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**
Approximately 4,313 respondents take 2 minutes each to complete form SSA-120 each year. Accordingly, the burden is 144 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 the 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**
This new collection increases the public reporting burden. See question #12 for updated burden figures.
 - 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 in 5 CFR 1320.9 and related provisions in 5 CFR 1320.8(b) (3).
- B. Collections of Information Employing Statistical Methods**
SSA does not use statistical methods for this information collection.