

**Supporting Statement for Form SSA-132
Notification of a Social Security Number (SSN) to an Employer
for Wage Reporting Purposes
20 CFR 422.103(a)
OMB No. 0960-0778**

A. Justification

1. Introduction/Authoring Laws and Regulations

Section 205(c)(2)(B)(i)(I) of the *Social Security Act* and Section 20 *CFR 422.103(a)* of the *Code of Federal Regulations* provide the legal authority for collecting the information on Form SSA-132. These regulations also explain how an individual's name and Social Security number (SSN) identify the record that the Social Security Administration (SSA) uses to record wages or self-employment income reported by individuals or their employer.

2. Description of the Collection

Individuals applying for employment must provide an SSN or indicate they have applied for one. However, when an individual applies for an initial SSN, there is a delay between the assignment of the number and the delivery of the SSN card. At an individual's request, SSA uses Form SSA-132 to send the individual's SSN to an employer. Mailing this information to the employer (1) ensures the employer has the correct SSN for the individual; (2) allows SSA to receive correct earnings information for wage reporting purposes; and (3) reduces the delay in the initial SSN assignment and delivery of the SSN information directly by SSA to the employer. It also enables SSA to verify the employer as a safeguard for the applicant's personally identifiable information.

This is especially important to foreign exchange visitors who are in the United States to work during the summer. Often, SSA receives a returned SSN card either because the exchange visitor is no longer in the service area, or because they have returned to their country of origin when the card arrives in the mail. When SSA receives earnings information from an employer and those earnings do not have an SSN associated with the wage earner, SSA cannot post the earnings information to that wage earner's record. SSA places the resulting incomplete earnings history in an earnings suspense file.

Individuals applying for an original SSN who would like SSA to release the SSN directly to their employer sign Form SSA-132. Then, the SSA field office (FO) sends the SSN directly to their employer. The majority of individuals who take advantage of this form are in the United States with exchange visitor and student visas.

There are two scenarios for use of Form SSA-132:

- Scenario 1: Individuals applying for an SSN bring Form SSA-132 to an SSA FO at the time of their SSN application. The individual provides all of the employer information on the form. The FO verifies the employer information against SSA employer files. Applicants sign their name and date the form. The FO completes the form with the applicant's assigned SSN and mails the form to the applicant's employer.

- **Scenario 2:** An applicant comes to the FO to apply for an original SSN without Form SSA-132. The applicant advises SSA that their employer needs the SSN immediately. The FO obtains employer information from the applicant and compares it to SSA employer files to ensure we mail the SSN to the correct employer address. The applicant signs and dates the form. The FO completes the form with the applicant's assigned SSN and mails the form to the applicant's employer.

The majority of individuals who take advantage of this option are in the United States with exchange visitor and student visas; however, we allow any applicant for an SSN to use the SSA-132. The respondents are individuals applying for an initial SSN who ask SSA to mail confirmation of their application or the SSN to their employers.

3. Use of Information Technology to Collect the Information

There is no electronic option for this form. Because this process involves applications for original SSNs and the SSN applicants are unknown to SSA, we cannot electronically authenticate them without comparing the identification information they provide with SSA's existing records. In addition, many of the SSN applicants who use this form are citizens of countries outside the United States, and are only here temporarily before returning to their countries of origin. Further, SSA does not provide one-way transmission of SSNs to employers or other third parties at the initial assignment of the SSN. Therefore, SSA will not be implementing an electronic version of the form under the agency's Government Paperwork Elimination Act plan.

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 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, a greater number of employers would report earnings information without an SSN for individuals (e.g., exchange visitors holding a visa who obtain temporary employment during the summer). When employers do not report the employee's SSN, SSA is unable to credit that individual's earnings record, and places the earnings in a suspense file. This ultimately could cause errors of incorrect benefit payment amounts to potential future beneficiaries. Because we only collect this information when the respondent requests it, we cannot collect it less frequently. There are no technical or legal obstacles that prevent burden reduction.

7. Special Circumstances

There are no special circumstances that would cause SSA to collect this information 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 October 15, 2012, at 77 FR 62593, and we received no public comments. SSA published the second Notice on December 26, 2012, at 77 FR 76160. If we receive comments in response to the 30-day Notice, we will forward them to OMB.

9. Payment of Gifts to Respondents

SSA provides no payment 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

Approximately 249,000 respondents use Form SSA-132 annually. The estimated average response time is 2 minutes, for 8,300 burden hours. The total burden reflects burden hours, and we did not calculate a separate cost burden.

13. Annual Cost to the Respondents

There is no known cost burden to the respondents.

14. Annual Cost to the Federal Government

The annual cost to the Federal Government is \$189,240. This estimate is for processing the information and printing it in field offices on an as-needed basis.

15. Change in Reporting Burden

We decreased the public reporting burden to reflect the updated burden data we have for FY 2011. In FY 2011, SSA enumerated approximately 249,000 foreign students (F1) and exchange visitors (J1). Absent any mechanism that measures the number of individuals that utilize form SSA-132, we use this figure as the number of respondents for the reporting burden (assuming that every F1 and J1 needed to complete Form SSA-132). This is consistent with how we calculated and reported the number of respondents previously.

16. Publishing the Results of the Information Collection

SSA will not publish the results of the information collection.

17. Displaying the OMB Approval Expiration Date

OMB granted SSA an exemption from the requirement to print the OMB expiration date on its program forms. SSA produces millions of public-use forms with life cycles exceeding those of an OMB approval. Since SSA does not periodically revise and reprint its public-use forms (e.g., on an annual basis), OMB granted this exemption so SSA would not have to destroy stocks of otherwise useable forms with expired OMB approval dates, avoiding Government waste.

18. Exception 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.