**SUPPORTING STATEMENT**

**U.S. Department of Commerce**

**U.S. Census Bureau**

**SSA Supplement on Retirement, Pensions, and Related Content**

A. Justification

1. Necessity of Information Collection

The U.S. Census Bureau requests authorization from the Office of Management and Budget (OMB) to conduct the SSA Supplement on Retirement, Pensions, and Related Content (SSA Supplement) for the Social Security Administration (SSA). The Census Bureau and the SSA entered into an Interagency Agreement (IAA) in May 2010 that states the Census Bureau will conduct for the SSA a survey to collect data on retirement, pensions, marital history, and disabilities as a supplement to the 2014 Survey of Income and Program Participation (SIPP) Panel, and process the data. That original agreement was renewed each year by IAA modifications from 2011 to 2014.

The data topics included in the SSA Supplement were previously collected in topical modules in the former SIPP Panels. These data were excluded from the 2014 SIPP data collection design as they were not required in each wave of data collection, and their elimination from the core interview reduced recurring respondent burden during the revised annual SIPP interview. To continue to have data for incorporation into their programmatic evaluations, the SSA has requested that the Census Bureau conduct the SSA Supplement beginning in September 2014. SSA specifically requested that the interview follow-up interviewed Wave 1 SIPP respondents, necessitating it’s fielding after the completion of the 2014 SIPP Wave 1 interview. This differs from the topical module concept in previous SIPP panels where the topical modules were administered in conjunction with the core SIPP interview. The SSA Supplement will be conducted about 4 months following the completion of the 2014 SIPP Panel Wave 1 data collection. The time from the 2014 SIPP Wave 1 interview to the SSA Supplement interview may be as long as 8 months or as short as 4 months. The SSA Supplement is designed to occur only once during the 2014 SIPP Panel.

The main objective of the SSA Supplement is to provide the SSA with detailed information about personal retirement plans (e.g., Individual Retirement Accounts (IRAs), Keogh accounts, 401k, 403b, 503b, and thrift plans); participation in pension and retirement plans provided by an employer or business; current and previous marital status; self-designation of health status; work disability; and adult and child disability. These data are collected from SIPP interviewed Wave 1 respondents, and along with data collected in the 2014 Panel SIPP interviews, will allow the SSA to create a picture of the economic and social situation of people with disabilities and/or those in or approaching retirement. The SSA also needs to estimate those legally eligible for Old Age Survivors and Disability Insurance (OASDI) divorce benefits, that is, 120 months of marriage before divorce to an entitled worker. This information assists the SSA in making informed decisions about policies and programs that will affect older and/or disabled Americans. See Attachment A for the interview questions. The SSA Supplement is authorized by Title 13, United States Code, Section 8(b) and by Section 1110 [42 U.S.C 1310] (a)(1) of the Social Security Act.

2. Needs and Uses

The SSA bases two of its major policy micro-simulations on the SIPP: 1) Modeling Income in the Near Term (MINT) for evaluating Social Security reform; and, 2) the Financial Eligibility Model (FEM) for evaluating Supplemental Security Income (SSI), Qualified Medicare Beneficiary, and Medicare Part-D Low Income Subsidy (LIS) programs.

MINT projects the economic and demographic condition of older Americans based on data developed by SSA and the Census Bureau. MINT is continually updated using data from current SIPP panels. SSA uses MINT to simulate the impact of legislative changes to OASDI. The MINT estimates are relied upon by the Office of Management and Budget, the Council of Economic Advisors, the Congress, the Governmental Accountability Office, and the SSA. MINT is also used to estimate economic well-being indicators of older Americans in future years. Of specific importance to the SSA is the impact of the legislative changes on the economic well-being of future beneficiaries. The SSA also assesses people’s ability to save for retirement (including the behavior of people putting money into and taking money out of retirement accounts), marital histories of the population, and eligibility for OASDI survivor and retirement benefits.

The FEM assists policy makers in evaluating the effectiveness of the SSI program. Information from SIPP is matched to SSA administrative data to model SSI eligibility and participation and to study eligibility for Medicare buy-in programs and the LIS under Medicare Part-D. Information on disability and work limitations are used to estimate whether an individual meets the disability criteria for SSI eligibility and if the criteria need to be modified.

Since the 1996 SIPP panel, the SSA has used data collected by the SIPP for policy evaluation research and the modification of government programs. Prior to the 2014 SIPP redesign, the data came from core questions asked each Wave and from intermittent topical supplements. As part of an effort to streamline the annual data collection in the SIPP instrument, the redesigned SIPP does not include some topical data previously used by the SSA for the MINT and FEM models.

The data collected in the Supplement will allow the SSA to do a comparative analysis of the effect of the economic downturn and make adjustments to their MINT and FEM models if substantial differences in the data are identified. The SSA does not plan to produce a direct report product from this data collection, but plans to primarily use the information collected in conjunction with SIPP 2014 panel data as input information for their modeling activities with MINT and FEM.[[1]](#footnote-1) The SSA cannot obtain these data from any other source.

The SSA Supplement is the first externally sponsored survey to take advantage of the opportunity to integrate with the new SIPP annual interviewing design. The value of integrating the SSA Supplement content with the longitudinal SIPP data collection is a benefit to both programs. The SSA Supplement data will be matchable to SIPP respondents and will be released as public use data. The details about the population’s savings behavior and their disability status coupled with four-year longitudinal data for the population will be an important resource extending the utility of both data collections and will support stakeholders beyond the limits of the partner agencies. The power of the new SIPP program to support interagency projects like this is an important feature in the SIPP program’s redesign.

Information quality is an integral part of the pre-dissemination review of the information disseminated by the Census Bureau (fully described in the Census Bureau’s Information Quality Guidelines). Information quality is also integral to the information collections conducted by the Census Bureau and is incorporated into the clearance process required by the Paperwork Reduction Act (PRA).

3. Use of Information Technology

The Census Bureau will use computer-assisted telephone interviewing (CATI) to conduct the interviews. Interviewers collect the data from eligible respondents from three telephone centers[[2]](#footnote-2) using desktop computers. Utilization of the telephone centers facilitates an improved ability to reach respondents at times that are convenient for those responding to the survey. Automation significantly enhances our efforts to collect high quality data with skip instructions as well as data consistency checks programmed into the instrument. Furthermore, information obtained in the earlier SIPP Wave 1 interview is fed back to the respondent to aid in memory recall. Response burden will be minimized by incorporating design features that make it easier to collect and record respondent information. Therefore, screening questions and lead-in questions are built into the automated instrument to skip respondents out of sections of the questionnaire that are not relevant or applicable.

4. Efforts to Identify Duplication

As discussed in Section 1, the SSA Supplement consists of content previously collected in the SIPP topical modules that were eliminated as part of the SIPP re-engineering. No other current data source is available which provides as comprehensive a set of statistics for analysis.

5. Minimizing Burden

The Census Bureau uses appropriate technology to keep respondent burden to a minimum. Examples of technology used to minimize respondent burden include the use of appropriate screening and lead-in questions that serve to skip respondents out of sections of the CATI instrument that are not relevant or applicable to them.

6. Less Frequent Collection

The SSA Supplement will interview respondents only once per SIPP panel. Previously, some topical modules (e.g., Retirement and Pensions), were conducted more than once during a panel.

7. Special Circumstances

There are no special circumstances associated with this clearance request.

8. Consultations Outside the Agency

We published a notice in the *Federal Register* on January 30, 2014, Vol. 79, No. 20, pages 4870-4871, inviting public comment on our plans to submit this request. We received no comments in response to this notice.

We consult with the SSA on a regular basis concerning inclusion and content of questions, structure of the instrument, edit and weighting specifications, and timing of release of the data. Our primary liaison at the SSA is Howard Iams of the Office of Research, Evaluation, and Statistics. His contact information is in Part B of this Supporting Statement.

9. Paying Respondents

We are not paying respondents or providing them gifts to complete the SSA Supplement interview.

10. Assurance of Confidentiality

We are conducting this survey under the authority of Title 13, United States Code, Section 8(b) and by Section 1110 [42 U.S.C 1310] (a)(1) of the Social Security Act. Section 9 of Title 13, U.S.C. requires us to keep all information strictly confidential. The respondents will be informed of the confidentiality of their responses and that this is a voluntary survey by a letter from the Director of the Census Bureau that will be sent to all participants in the survey (Attachment B).

11. Justification for Sensitive Questions

The sources of income from assets[[3]](#footnote-3) and contributions to pensions and retirement accounts; limitations in activities of daily living (ADLs); and disclosure of specific disabilities in both adults and children are among the kinds of data collected and possibly considered of a sensitive nature. The requirements of the interagency agreement and the Census Bureau support the position that the collection of these types of data is necessary for the analysis of important policy and program issues, and consequently the design of the data collection instrument has structured the questions to lessen their sensitivity.

12. Estimate of Respondent Burden

29,825 households were interviewed for the 2014 Wave 1 SIPP panel. We estimate that each household contains 2.1 people aged 15 and above, yielding approximately 62,632 person-level interviews per Wave in this panel. Interviews take approximately 30 minutes per adult on average, consequently the total annual burden for SSA Supplement interviews will be 31,316 hours.

|  |  |  |  |  |
| --- | --- | --- | --- | --- |
|  | Respondents | Responses | Hours Per Response | **Total  Hours** |
| Interview | 62,632 | 62,632 | 0.5 | 31,316 |
| **Totals** | 62,632 | 62,632 | 0.5 | 31,316 |

These time estimates are based on our experiences of asking the topical module questions from previous SIPP Panels and internal testing of the SSA Supplement instrument.

13. Estimate of Cost Burden

There are no direct costs to respondents participating in the survey other than the time involved in answering the survey questions.

14. Cost to Federal Government

The production costs of all parts of the SSA Supplement are approximately $8,000,000.00, and are paid entirely by the SSA. That amount is included in the estimate of total costs to the federal government of the Census Bureau's current programs supplied to the OMB.

15. Reason for Change in Burden

There is no change in burden because this data collection is being submitted as new.

16. Project Schedule

The SSA Supplement advance letters will be mailed prior to interviewing in August 2014. Interviewing will be conducted from September to October of 2014. If necessary, interviewing can continue into the first two weeks of November 2014. The data will be processed[[4]](#footnote-4) and provided to the SSA who will perform all analyses associated with this data collection. We will release a public use data product, via the SIPP Website, with the ability to match to the 2014 SIPP public use data, on a schedule to be determined.

17. Request Not to Display Expiration Date

The expiration date is displayed in the advance letter that will be sent to eligible respondents.

18. Exceptions to the Certification

There are no exceptions to the certification.

1. <http://www.ssa.gov/policy/about/mint.html> [↑](#footnote-ref-1)
2. Hagerstown, MD; Jeffersonville, IN; Tucson, AZ [↑](#footnote-ref-2)
3. Specifically: Individual Retirement Accounts (IRAs), Keogh accounts, and 401k, 403b, and thrift savings accounts. [↑](#footnote-ref-3)
4. Edited with appropriate weights for analysis purposes. [↑](#footnote-ref-4)