

**SUPPORTING STATEMENT FOR FORM SSA-157
DATA EXCHANGE REQUEST FORM
OMB No. 0960-NEW**

A. Justification

- 1. Introduction/Authoring Laws and Regulations** – The Social Security Administration (SSA) maintains approximately 3,000 data exchange agreements and regularly receives new requests from Federal, State, local, and foreign governments, as well as private organizations, to share data electronically. SSA engages in various forms of data exchanges from Social Security number verifications to computer matches for benefit eligibility, depending on the requestor’s business needs. Section 1106(b) of the Social Security Act allows for such data exchanges subject to limitations as set by the agency.

There are several factors considered in SSA's decision-making policy on whether to engage in a data exchange. We must consider the requestor’s legal authority to receive the data, our disclosure policies, systems’ feasibility, systems’ security, and costs. When a requestor asks SSA for data, we ask them several questions in order to determine whether to pursue a data exchange with them. We enumerate those questions in Form SSA-157, Data Exchange Request Form. The respondents are Federal agencies, State or local agencies, foreign governments, or private organizations that are voluntarily initiating a request for data from SSA.

- 2. Description of Collection** - SSA requires an instrument that requestors can use to facilitate their request for data from SSA. We will use Form SSA-157, Data Exchange Request Form, for this purpose. Requesting agencies, governments, or private organizations use the form when voluntarily initiating a request for data from SSA. SSA will provide the form as a fillable PDF via the agency’s data exchange web page, for respondents to complete and send electronically to SSA. We will not develop a paper form.
- 3. Use of Information Technology to Collect the Information** – In accordance with the agency’s Government Paperwork Elimination Act plan, SSA created an Internet version of Form SSA-157. We will not develop a paper form; therefore, 100 percent of respondents under this information collection will use the electronic version.
- 4. Why We Cannot Use duplicate Information** – Because each data exchange request is unique in terms of the data sought and how requestor’s will use the data, 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 information.
- 5. Minimizing Burden on Small Respondents** - This collection does not significantly 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-157, Federal, State, local, and foreign governments, and private organizations would have no way to request a data exchange from SSA. Because, we only collect the information once, 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 conduct this information collection in a manner inconsistent with 5 *CFR* 1320.5.
- 8. Solicitation of Public Comment and other Consultations with the Public** - SSA published the 60-day advance Federal Register Notice on February 23, 2015, at 80 FR 9499, and we received no public comments. The first Federal Register Notice shows incorrect burden information for the SSA-157. We have corrected for this in the second Notice, in #12 below, and on ROCIS.

We published the 30-day FRN published on April 30, 2015, at 80 FR 24307. If we receive any comments in response to this Notice, we will forward them to OMB.

- 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.

Based on SSA’s Office of General Counsel guidance, since we are not collecting personal identifying information, the collection instrument does not require a Privacy Act Statement.

- 11. Justification for Sensitive Questions** - This information collection does not contain any questions of a sensitive nature.

- 12. Estimates of Public Reporting Burden** – Approximately 180 respondents take 30 minutes each to complete Form SSA-157 each year. However, thirty-three percent are Federal respondents (59 respondents) not subject to Paperwork Reduction Act requirements. Thus we are not including them in this information collection request. Below is a breakdown of the non-Federal respondents (excluding foreign governments) and the estimated hourly and annual burden data.

Type of Respondent	Number of Respondents	Frequency of Response	Average Burden Per Response	Estimated Total Annual Burden (hours)

			(minutes)	
State and local governments	99	1	30	50
Private sector organizations	22	1	30	11
Totals	121			61

13. Annual Cost to the Respondents (Other) – This information 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 we account for the cost of maintaining the system that collects this information 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 is a new information collection that increases the public reporting burden.

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 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.