# Supporting Statement for Form SSA-159, Government to Government Services Online (GSO) Website Registration; Form SSA-160, Government to Government Services Online Website Account Modification/Deletion 20 CFR 401.45 OMB No. 0960-0757

### **A.** Justification

## 1. Introduction/Authoring Laws and Regulations

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. In addition, Section 5 *USC* 552a (f)(2) & (3) requires Federal 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. SSA promulgated Privacy Act rules in the *Code of Federal Regulations, Subpart B.* We list our procedures for verifying identity at 20 *CFR* 401.45, and use Forms SSA-159 and SSA-160 to collect this information.

# 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 files in return. 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 from Form SSA-159 (Government-to-Government Services Online Website Registration Form) to register the requestor to use the GSO website. SSA then creates a user's account based on this information. SSA provides the user with account information and conducts a walkthrough of the Government-to-Government Services website as necessary. Established organizations submit Form SSA-159 to register additional users as well. 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 and local government 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 percent of

respondents use the electronic version of the SSA-160.

### 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.

Gonsequence 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 on an 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 SSA published the 60-day advance Federal Register Notice published on May 20, 2016, at 81 FR 31999, and we received no public comments. SSA published the second Notice on July 22, 2016 at 81 FR 47845. If we receive any comments in response to the 30-day Notice, we will forward them to OMB. We did not consult with the public on the revision of this form.

### 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), 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

We estimate 1,543 respondents use the SSA-159 each year to register to use the GSO website, and that it takes them approximately 15 minutes to complete the registration for a total of 386 hours. We estimate it 130 respondents use the SSA-160 annually to make changes to their GSO account, and it takes approximately 15 minutes for them to complete the form, for a total of 33 hours. See the following chart for the breakdown of this information:

Modality of Completion	Number of Respondents	Frequency of Response	Average Burden Per Response (minutes)	Estimated Total Annual Burden (hours)
SSA-159	1,543	1	15	386
SSA-160	130	1	15	33
Total	1,673			419

The total burden for this information collection request is **419 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

The overall number of respondents who need to register to use GSO decreased; therefore, we show an overall decrease in the burden for this information collection request. However, for the remaining respondents, our management information (MI) data shows an increase in use for the SSA-159 and a decrease for the SSA-160. Per our MI data, more people are registering to use GSO, while fewer users need to make modifications to their accounts as they become more familiar with the process.

#### 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.