

**Justification for Non-Substantive Changes for Form SSA-157
Data Exchange Request Form
OMB No. 0960-0802**

Justification for Non-Substantive Changes to the Collection or Resubmission of the Collection within One Year of OMB Approval

Revisions to the Collection Instrument:

- **Change #1:** We modified the language on our website to include new directions as part of our Service to Epidemiological Researchers.

Justification #1: Our old directions to the epidemiological researchers had them create a separate documentation for their research request under OMB No. 0960-0701; however, since we established the Data Exchange Request Form, SSA-157, we no longer require any researchers to complete separate forms. Therefore, our new directions indicate they need to complete the SSA-157 to receive the services we offer to Epidemiological researchers. In addition, we discontinued use of 0960-0701, as the new SSA-157 offers an easier way for researchers to request the same information from SSA.

- **Change #2:** We revised our Internet directions for Requesting An Electronic Data Exchange to include requesting vital status data for epidemiological research.

Justification #2: Previously we did not specifically include this data on our website for the Data Exchange Requests; however, since we discontinued our process for requesting vital status data under 0960-0701, epidemiological researchers only use the SSA-157 (0960-0802) to complete their request for vital status or other data exchange information. Therefore, we included this information on our website to avoid any confusion, and allow those epidemiological researchers to find the information they wish to request faster.

- **Change #3:** We are updating our burden information to include the epidemiological research requestors who previously requested information under 0960-0701.

Justification #3: Since we discontinued 0960-0701, and replaced it with the SSA-157, we are including those researchers who previously used 0960-0701 for their epidemiological research requests under 0960-0802:

Type of Respondent	Number of Respondents	Frequency of Response	Average Burden Per Response (minutes)	Estimated Total Annual Burden (hours)
State and local governments	114	1	30	57

Private sector organizations	32	1	30	16
Totals	146			73

Note: We inadvertently did not submit these revisions in February 2017 when we began using the SSA-157 to complete all Internet data exchange requests, including the epidemiological requests. We are correcting that oversight now, to bring these changes into compliance with the PRA. We understand that this lapse is a violation of the PRA; therefore, we will list this as a violation of the PRA in our next ICB submission.