

**Supporting Statement for Electronic Records Express (ERE) Third Party  
OMB No. 0960-0767**

**A. Justification**

**1. Introduction/Authoring Laws and Regulations**

Electronic Records Express (ERE) allows us to provide online copies of documents and digital audio hearing recordings contained in disability claimants' files to the claimant's third party representative. Third party appointed representatives can obtain the same information from SSA as the disability claimant. The respondents are third party appointed representatives, and the information they supply allows us to provide them access to view and download all aspects of their clients' disability files online through ERE. We developed ERE as an electronic platform under the auspices of the E-Government Act of 2002 (Public Law 107-347) and the Government Paperwork Elimination Act (GPEA; Pub. L.105-277).

**2. Description of Collection**

ERE is an online system which enables medical providers and various third party representatives to download and submit disability claimant information electronically to SSA as part of the disability application process. To ensure only authorized people access ERE, SSA requires third parties to complete a unique registration process if they wish to use this system. This Information Collection Request (ICR) includes the process to request a download through the Appointed Representative suite of services screens; the burden for submitting evidence to SSA is part of other, various ICRs. The respondents are third party representatives of disability applicants who want to use ERE to electronically access clients' disability files online and submit information to SSA.

**3. Use of Information Technology to Collect the Information**

ERE is a web-based program originally developed by SSA under the aegis of, and in accordance with, the Government Paperwork Elimination Act plan. Based on our data, we estimate approximately 100% of respondents under this OMB number use the electronic version.

**4. Why We Cannot Use Duplicate Information**

The nature of the information we collect and the manner in which we collect 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.

**6. Consequence of Not Collecting Information or Collecting it Less Frequently**

If we did not request the Social Security Number (SSN) from third party appointed representatives, we could not provide access to their clients' files.

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**

The 60-day advance Federal Register Notice published on June 27, 2017 at 82 FR 29136, and we received no public comments. The 30-day FRN published on September 19, 2017 at 82 FR 43804. 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.

**11. Justification for Sensitive Questions**

The information collection does not contain any questions of a sensitive nature.

**12. Estimates of Public Reporting Burden**

<b>Modality of Completion</b>	<b>Number of Respondents</b>	<b>Frequency of Response</b>	<b>Number of Responses</b>	<b>Average Burden Per Response (minutes)</b>	<b>Estimated Total Annual Burden (hours)</b>
ERE – Third Parties	10,413	319	3,321,747	1	55,362

The total burden for this ICR is 55,362 hours. We based these figures on current management data information. 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 on the respondents.

**14. Annual Cost To Federal Government**

The annual cost to the Federal Government for this collection is approximately \$1,600,000. This estimate accounts for costs from the following areas: (1) designing the application; and (2) systems development, updating, and maintenance costs.

**15. Program Changes or Adjustments to the Information Collection Request**

The decrease in burden hours stems from a decrease in the number of respondents, even though we show an increase in the frequency of response. We do not anticipate significant changes in the number of third party appointed representatives that choose to obtain this information electronically through ERE.

**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.

**1. 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.