

**Supporting Statement for the
Help America Vote Act (HAVA)
OMB No. 0960-0706**

A. Justification

1. Introduction/Authoring Laws and Regulations

On October 29, 2002, President George W. Bush signed into law *H.R. 3295*, the *Help America Vote Act of 2002 (HAVA)*; later *P.L. 107-252*, which mandates that states must verify the identities of newly registered voters. Section 303 of the law specifies an area requiring the Social Security Administration's (SSA) involvement. Specifically, when newly registered voters do not have driver's licenses or state-issued identification (ID) cards, they must supply the last four digits of their Social Security numbers (SSN) to their local state election agencies for verification. The election agencies forward the new registrant candidates' names; dates of birth (DOB); and the last four digits of their SSNs to the candidates' state Motor Vehicle Administration (MVA). The state MVAs input and route the data to the American Association of Motor Vehicle Administrators (AAMVA) as a consolidation point for data transfer. AAMVA forwards the transactions to SSA's Help America Vote Verification (HAVV) system. Once SSA's HAVV system verifies if the information provided is a "match" or "no match," the information returns along the same route (in reverse) until it reaches the state election agency.

2. Description of Collection

SSA verifies the information provided by the state election agencies for newly registered voters who do not have a driver's license or State ID card. Ultimately, the State election agencies use this information to ensure that the people registering to vote may legally do so.

Specifically, individuals registering to vote must provide their driver's license number to their state election agency. If they have no driver's license or state-issued ID card, they must supply the last four digits of their SSN. The state election agency forwards the new registration candidate's name, DOB, and the last four digits of the individual's SSN to the state MVA. SSA requires state MVAs to use AAMVA as a consolidation point for data transfer. The MVA inputs this data, routing the applicant's information to the AAMVA network hub. AAMVA forwards the transaction to SSA's HAVV system. SSA's HAVV system returns the result (a "match" or "no match" of name, DOB, and last four digits of an SSN) to the AAMVA hub, which then routes the information back to the state MVA. The MVA sends the results to the state election agency.

SSA does not collect individual identifying information during these transactions. The HAVV system only verifies the accuracy of the information provided using the following response codes:

Response Code	Definition
S	Invalid Data

T	Multi Matches All Deceased
V	Multi Matches All Alive
W	Multi Matches Mixed
X	Single Match Alive
Y	Single Match Deceased
Z	No Match Found
9	System Error: Unable to Process at this Time

The respondents are the State MVAs seeking to confirm voter identities.

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 HAVA. Based on our data, we estimate 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 SSA did not verify the identities of newly registered voters, we would be in violation of the HAVA legislation. 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 July 5, 2017 at 82 FR 31132, and we received no public comments. SSA published the second Notice on September 19, 2017 at 82 FR 43804. If we receive comments in response to the 30-day Notice, we will forward them to OMB. We did not consult with the public in 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), 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**
 Forty-Eight State MVAs participate in HAVA via signed Information Exchange Agreements with SSA. Based on our current management information (MI) data, the 48 states submitted information approximately 102,877 times each for 4,938,093 responses total. We estimate each response took 2 minutes to complete the HAVV request. Accordingly, the burden is 164,603 hours, as seen on the chart below:

Modality of Completion	Number of Respondents	Frequency of Response	Number of Responses	Average Burden Per Response (minutes)	Estimated Total Annual Burden (hours)
HAVV	48	102,877	4,938,096	2	164,603

This figure represents burden hours only; we calculated a separate cost burden for the MVA respondents in #13 below.

13. **Annual Cost to the Respondents (other)**
 Per our current MI data, the 48 state MVAs participating in HAVA each pay an annual maintenance cost of \$4,000.00. Additionally, states pay .02 cents per verification request. Therefore, the total cost to respondents is \$291,348.

14. **Annual Cost to the Federal Government**
 This collection does not pose a recognizable cost to the Federal Government, because we bill states (via AAMVA) for using our HAVV system. The cost to the respondents covers the entirety of the systems development, updating, and maintenance costs for the HAVV system, so the Federal Government has no additional annual costs.

15. **Program Changes or Adjustments to the Information Collection Budget**
 The increase in burden hours stems from an increase in the number of MVA respondents using the HAVV system. The decrease in the cost to the MVA respondents is due to changes in our accounting for this ICR. We based our current cost information on current MI data for FY 2016.

16. **Plans for Publication Information Collection Results**
 SSA will not publish the results of the information collection.

17. **Displaying the OMB 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. **Collection of Information Employing Statistical Methods**

SSA does not use statistical methods for this information collection.