

Supporting Statement for Tribal Council Coverage Agreement
OMB No. 0960-NEW

A. Justification

1. Introduction/Authoring Laws and Regulations

Section 218A of the *Social Security Act (Act)* allows Indian tribal council members to voluntarily obtain Social Security coverage. The Social Security Administration (SSA) will extend coverage based upon an agreement signed between the Indian tribe and SSA. Because of the above law, SSA will use the Section 218A Agreement template to collect the necessary information, and grant Social Security coverage to tribal council members.

2. Description of Collection

SSA will use the Tribal Council Coverage Agreement to collect information if a tribe wishes to obtain Social Security coverage. Each tribe requesting coverage fills out an agreement, and SSA employees collect the information via the Coverage Agreement form. The respondents are Indian tribal councils who wish to receive Social Security coverage for their members.

3. Use of Information Technology to Collect the Information

The Section 218A agreement will be available as a print-only PDF on SSA's website. SSA did not create an electronic version of the Section 218A agreement under the agency's Government Paperwork Elimination Act (GPEA) plan because only 100 respondents complete the form annually. This is less than the GPEA cut-off of 50,000.

4. Why We Cannot Use Duplicate Information

The nature of the information we collect and the manner in which we collect it precludes 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 use the Section 218A agreement, Indian tribes would have no way to obtain voluntary Social Security coverage for their Indian Tribal Council members. Because we only collect the information once, 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 January 25, 2019, at 84 FR 371, and we received no public comments. The 30-day FRN published on March 27, 2019 at 84 FR 11625. 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

Modality of Completion	Number of Respondents	Frequency of Response	Average Burden Per Response (minutes)	Estimated Total Annual Burden (hours)
Tribal Council Coverage Agreement	100	1	10	17

The total burden for this ICR is **17** hours. We estimated this figure per the current pool of possible respondents of federally recognized Indian tribes. 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 is approximately \$3,624. This estimate accounts for costs from the following areas: (1) designing, printing, and distributing the form; and (2) SSA employee (e.g., field office, 800 number, DDS staff) information collection and processing time.

15. Program Changes or Adjustments to the Information Collection Request
 This is a new agreement that increases the public reporting burden. See #12 above for burden figures.

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

17. Displaying the OMB Approval Expiration Date
OMB granted SSA an exemption from the requirement to print the OMB expiration date on its program forms. SSA produces millions of public-use forms with life cycles exceeding those of an OMB approval. Since SSA does not periodically revise and reprint its public-use forms (e.g., on an annual basis), OMB granted this exemption so SSA would not have to destroy stocks of otherwise useable forms with expired OMB approval dates, avoiding Government waste.

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.