

**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, Sections 5 *USC 552a (f)(2) & (3)* require 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 published Privacy Act rules in the *Code of Federal Regulations (CFR), 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 complete an online Form SSA-160 (Government-to-Government Service Online Website Account Modification/Deletion Form) to modify its online account (e.g., address change). Respondents are State and local government agencies and some private sector business entities.

3. Use of Information Technology to Collect the Information

SSA created a fillable PDF version of Form SSA-159, which is available on our website. Due to the low volume of respondents for this form, the form is not a good candidate for electronic implementation. However, SSA did create 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 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 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 inability 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**
The 60-day advance Federal Register Notice published on June 4, 2019, at 84 FR 25891, and we received no public comments. The 30-day FRN published on August 13, 2019 at 84 FR 40121. 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)	Average Theoretical Hourly Cost Amount (dollars)*	Total Annual Opportunity Cost (dollars)**
SSA-159	1,151	1	15	288	\$19.69*	\$5,671**
SSA-160	410	1	15	103	\$19.69*	\$2,028**
Totals	1,561			391		\$7,699**

* We based these figures on average Information and Record Keeping Analysts hourly salary, as reported by Bureau of Labor Statistics data.

** This figure does not represent actual costs that SSA is imposing on recipients of Social Security payments to complete this application; rather, these are theoretical opportunity costs for the additional time respondents will spend to complete the application. **There is no actual charge to respondents to complete the application.**

The total burden for this ICR is **391** burden hours (reflecting SSA management information data), which results in an associated theoretical (not actual) opportunity cost financial burden of **\$7,699**. SSA does not charge respondents to complete our applications.

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 annual cost to the Federal Government is approximately \$35,435. This estimate accounts for costs from the following areas: (1) designing, printing, and distributing the form; (2) SSA employee (e.g., field office, 800 number, DDS staff) information collection and processing time; and (3) systems development, updating, and maintenance costs.

15. Program Changes or Adjustments to the Information Collection Request

When we last cleared this IC in 2016, the burden was 419. However, we are currently reporting a burden of 391 hours. This change stems from a decrease in the number of responses from 1,673 to 1,561. There is no change to the burden time per response. Although the number of responses changed, SSA did not take any actions to cause this change.

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.