

Supporting Statement for Public Information Campaign
OMB No. 0960-0544

A. Justification

1. Introduction/Authoring Laws and Regulations

Periodically, the Social Security Administration (SSA) conducts the Public Information Campaign. As part of this program, the agency releases public information materials, including public service announcements; news releases; and educational tapes, to public broadcasting systems so they can inform the public about various programs and activities conducted by the agency. SSA disseminates one to two public information campaigns per year, and as part of the promotion of each campaign, SSA sends mailers to radio stations that encourage stations to air the radio PSAs, communicate where to download the broadcast-ready PSAs, and request stations communicate the number of times they plan to air the PSAs via business reply card. The purpose of the reply cards is to help SSA monitor the usage and obtain feedback on our public information materials. SSA collects this information under the authority of Section 205(a) of the *Social Security Act*.

2. Description of Collection

This information collection is part of a broader set of public outreach that SSA performs via a blanket purchase agreement. Recent awards include SS00-10-40025, which started its period of performance on 4/1/2010, and SS00-16-40015, which started its period of performance on 3/15/2016 and ends in March 2021.

For the Public Information Campaign, an SSA contractor mails out the business reply cards (BRC) following the mailing of public information materials, with the request that respondents mail the cards back to the contractor. The contractor combines the results from the business reply cards and provides them to SSA. In turn, SSA uses this information to determine what media format and what markets the public broadcast media aired the materials. Ultimately, this enables SSA to improve the public information materials.

The agency acknowledges that BRCs may provide limited actionable information due to the low response rate (approximately 3% in FY2019) and potential reporting bias. While not a complete indicator of all support, as a practical utility it does provide a sample of stations, timing, intended use of the campaign spots, etc. that allows us to gauge pick up around the country. We also note that the use of BRCs is industry standard practice. While some PSA distributors extrapolate or estimate earned media value from the sample of reporting, we take a more conservative approach to reporting earned media value by reporting on only the actual BRC responses received. We also use the BRC responses to maintain our distribution and pitching list for future PSA campaigns.

The respondents are broadcast radio sources, which the contractor maintains via a

proprietary dataset provided by the company Standard Rate and Data Service (SRDS).

3. **Use of Information Technology to Collect the Information**
This collection does not currently provide any capacity for electronic submission. The agency monitors emerging technology that may provide more robust or automated mechanisms for monitoring radio pick up of PSAs as we do through Nielsen with TV PSAs, but we have not identified a service with the coverage or affordability to justify the expense at this time.
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 conduct this information collection, we would have no means of obtaining feedback on the public information materials we mail to the public. Because we collect this information twice a year, 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 29, 2020, at 85 FR 45723, and we received no public comments. The 30-day FRN published on October 8, 2020 at 85 FR 63630. If we receive any comments in response to this Notice, we will forward them to OMB. We did not consult with the public in the maintenance of this collection.
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) **
Radio	5,000	2	1	167	\$25.76*	\$4,302**

* We based this figures on average Broadcast Announcers and Radio Disc Jockey’s hourly salary, as reported by Bureau of Labor Statistics data. [_ \(https://www.bls.gov/oes/current/oes_nat.htm\)](https://www.bls.gov/oes/current/oes_nat.htm).

** 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**

We base our burden estimates on current management information data, which includes data from years of conducting this information collection. Per our management information data, we believe that 1 minute accurately shows the average burden per response for reading the instructions, gathering the facts, and answering the questions. Based on our current management information data, the current burden information we provided is accurate. The total burden for this collection instrument is **129** burden hours (reflecting SSA management information data), which results in an associated theoretical (not actual) opportunity cost financial burden of **\$3,323**. 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 on the respondents.

14. **Annual Cost To Federal Government**

The annual cost to the Federal Government is approximately **\$6,200**. This estimate accounts for costs from the following areas:

Description of Cost Factor	Methodology for Estimating Cost	Cost in Dollars*
SSA Employee Designing the Form	Design Cost	\$400
Distributing, Shipping, and Material Costs for the Form	Distribution + Shipping + Material Cost	\$5,800

SSA Employee (e.g., field office, 800 number, DDS staff) Information Collection and Processing Time	GS-9 employee x # of responses x processing time	\$0
Full-Time Equivalent Costs	Out of pocket costs + Other expenses for providing this service	\$0
Systems Development, Updating, and Maintenance	GS-9 employee x man hours for development, updating, maintenance	\$0
Quantifiable IT Costs	Any additional IT costs	\$0
Total		\$6,200

* We have inserted a \$0 amount for cost factors that do not apply to this collection.

SSA is unable to break down the costs to the Federal government further than we already have. We based the costs above on the cost breakdown from the contractor we use for this mailing. We have calculated these costs as accurately as possible based on the information we collect for creating, updating, and maintaining these information collections.

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

There are no changes to the public reporting burden

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.