Supporting Statement for Notice to Electronic Information Exchange Partners to Provide Contractor List
SSA-731
OMB No. 0960-New

A.   Justification

1.   **Introduction/Authoring Laws and Regulations**
Federal standards in the Privacy Act of 1974, E-Government act of 2002, National Institute of Standard (NIST) SP 800-53-4, require the Social Security Administration to maintain oversight of the information it provides to Electronic Information Exchange Partners (EIEPs). EIEPs obtain SSA data for the administration of federally funded; state-administered and state funded; and state administered programs. SSA's responsibility to monitor and protect PII extends to the data SSA shares with other Federal and state agencies and private organizations through the Computer Matching and Privacy Protection Act and the Information Exchange Agreements (IEA). Under the terms of the State Transmission Component (STC) IEA and agency IEA, EIEPs agree they will comply with Electronic Information Exchange Security Requirements and Procedures for State and Local Agencies Exchanging Electronic Information with the Social Security Administration. Our requirements document, also known as the Technical Systems Security Requirements (TSSR), provides that all agencies using SSA data must ensure that SSA information is not processed, maintained, transmitted, or stored in, or by means of, data communications channel, electronic devices, computers, or computer networks located in geographic or virtual areas not subject to U.S. law.

2.   **Description of Collection**
SSA requires any organization with an electronic data exchange agreement, to provide the SSA Regional Office contact a current list of contractors, or agents who have access to SSA data upon request. SSA uses Form SSA-731, Notice to Electronic Information Exchange Partners to Provide Contractor List to collect this. The respondents are State, local, or tribal agencies-who exchange electronic information with SSA.

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 form SSA-731. 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 precludes duplication. SSA does not use another collection instrument to obtain similar data.

5. **Minimizing Burden on Small Respondents**
This collection does not significantly 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-731, stakeholders could potentially have contractors outside the United States misusing SSA's data. 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 March 26, 2020, at 85 FR 17155, and we received no public comments. The 30-day FRN published on July 29, 2020 at 85 FR 45723. 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 development (SSA-731 new 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**
This 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-731	300	1	20	100	$18.00*	$1,800**

* We based this figure on average State, local and tribal government worker's salaries.

** 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 **100** burden hours (reflecting SSA management information data), which results in an associated theoretical (not actual) opportunity cost financial burden of **$1,800**. 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 **$252,503**.

Description of Cost Factor	Methodology for Estimating Cost	Cost in Dollars*
Designing, Printing, and Distributing the Form	Design Cost + Printing Cost + Distribution Cost	$503
SSA Employee (e.g., field office, 800 number, DDS staff) Information Collection and Processing Time	GS-(whichever you used to calculate) employee x # of responses x processing time	$138,000
Systems Development, Updating, and Maintenance	GS (which ever you used to calculate) employee x man hours for development, updating, maintenance	$114,000
Total		**$252,503**

   SSA is unable to break down the costs to the Federal government further than we already have. First, since we work with almost every US citizen, we often do bulk mailings, and cannot track the cost for a single mailing. We do not track design costs or upkeep costs (as these are based on employee time and may vary from collection to collection). In addition, it is difficult for us to break down the cost for processing a single form, as field office and State Disability Determination Services staff often help respondents fill out several forms at once, and the time it takes to do so can vary greatly per respondent. As well, because so many employees have a hand in each aspect of our forms, we use an estimated average hourly wage, based on the wage of our average field office employee (GS-9) for these calculations. Finally, SSA prefers not to provide breakdowns of estimated payment to employees who process these items for a variety of reasons (only one of which is that it is not possible to do this entirely accurately

15. **Program Changes or Adjustments to the Information Collection Request**
   This is a new form that increases the public reporting burden. See #12 above for updated 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**
   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.   **Collections of Information Employing Statistical Methods**
   SSA does not use statistical methods for this information collection.