

Supporting Statement for Form SSA-120
Application for Access to SSA Systems
20 CFR 401.45
OMB No. 0960-0791

A. Justification

1. Introduction/Authoring Laws and Regulations

Section 205(a) of the *Social Security Act (Act)* provides the Commissioner of Social Security the authority to establish procedures for verifying identity. 20 CFR 401.45 of the *Code of Federal Regulations, Subpart B* provides procedures for verifying identity.

The Social Security Administration (SSA) collects this information by authority of the *Privacy Act of 1974*, at 5 U.S.C. 552A (e)(10), of the *United States Code* which requires agencies to establish appropriate administrative, technical, and physical safeguards to ensure the security and confidentiality of records. Sub-section 5 U.S.C. 552A (f)(2)&(3) requires 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. *Executive Order (E.O.) 10450* authorizes the collection of the data SSA requires on Form SSA-120. In addition, *E.O. 9397*, 26 CFR 31.6011(b)2, and 26 CFR 31.61091 provide specific authority for the use of Social Security numbers. 44 U.S.C. 3553 of the *Federal Information Security Modernization Act of 2014* amends the 44 U.S.C. 3543 of the *Federal Information Security Management Act (FISMA) of 2002*, state the authority and functions of the Director and the Secretary for developing and overseeing the implementation of policies, principles, standards, and guidelines on information security.

2. Description of Collection

SSA uses Form SSA-120 and the accompanying electronic version to allow authorized users to apply for access to SSA's information systems. SSA requires supervisory approval, and local or component security officer review, prior to granting access. The respondents are SSA employees and non-Federal employees (contractors) who require access to SSA systems to fulfill their jobs.

Note: Because SSA employees are Federal workers exempt from the requirements of the Paperwork Reduction Act, the burden we list in #12 below is only for SSA contractors.

3. Use of Information Technology to Collect the Information

SSA created an electronic version system called Systems Access Management (SAM). We use SAM to collect one hundred percent of the data we use. We only use the paper Form SSA-120 when SAM is not available. SAM is a process for initial access, access granting, access approval, access continuation, and access removal under the agency's Government Paperwork Elimination Act (GPEA).

SSA also created a fillable PDF version of this form for respondents to download, complete, print, and submit to SSA. Per the risk assessment our OGC conducted on this form, we are not able to make the signature line on the form fillable at this time. However, when we need to use this version of the form, we allow the respondent to use any electronic signature process available to them to sign it, in lieu of a wet signature.

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 use Form SSA-120, or the Systems Access Management (SAM) application, we would not have a way to track an individual's access to SSA's information systems and resources, nor would we be able to assure the confidentiality, integrity, and availability of SSA's information technology resources. 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 February 4, 2021, at 86 FR 8246, and we received no public comments. The 30-day FRN published on April 28, 2021 at 86 FR 22510. 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-120 (Internet version)	2,167	1	2	72	\$64.43*	\$4,639**

* We based this figure on average Federal Executive Branch worker’s hourly wages, as reported by Bureau of Labor Statistics data (https://www.bls.gov/oes/current/naics4_999100.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 actual interviews, as well as from years of conducting this information collection. Per our management information data, we believe that 10 minutes 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 **2.167** burden hours (reflecting SSA management information data), which results in an associated theoretical (not actual) opportunity cost financial burden of **\$24,351**. 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 **\$1,476,730**. This estimate accounts for costs from the following areas:

Description of Cost Factor	Methodology for Estimating Cost	Cost in Dollars*
Designing and Printing the Form	Design Cost + Printing Cost	\$380
Distributing, Shipping, and Material Costs for the Form	Distribution + Shipping + Material Cost	\$0*
SSA Employee (e.g., field office, 800 number, DDS staff)	GS-9 employee x # of responses x processing time	\$108,350

Information Collection and Processing Time		
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	1,368,000
Quantifiable IT Costs	Any additional IT costs	\$0*
Total		\$1,476,730

* 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. However, 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**
When we last cleared this IC in 2017, the burden was 60 hours. However, we are currently reporting a burden of 72 hours. This change stems from an increase in the completion time from 1.5 minutes to 2 minutes. We are using whole number to calculate the burden hours.
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 in 5 *CFR* 1320.9 and related provisions in 5 *CFR* 1320.8(b)(3).

B. Collections of Information Employing Statistical Methods

SSA does not use statistical methods for this information collection.