

Supporting Statement for Form SSA-132
Notification of a Social Security Number (SSN) to an Employer
for Wage Reporting Purposes
20 CFR 422.103(a)
OMB No. 0960-0778

A. Justification

1. Introduction/Authoring Laws and Regulations

Section 205(c)(2)(B)(i)(I) of the *Social Security Act* and Section 20 *CFR* 422.103(a) of the *Code of Federal Regulations* provide the legal authority for collecting the information on Form SSA-132. These regulations also explain how an individual's name and Social Security number (SSN) identify the record the Social Security Administration (SSA) uses to record wages or self-employment income individuals or their employers report.

2. Description of the Collection

Individuals applying for employment must provide an SSN or indicate they applied for one. However, when an individual applies for an initial SSN, there is a delay between the assignment of the number and the delivery of the SSN card. At an individual's request, SSA uses Form SSA-132 to send the individual's SSN to an employer. Mailing this information to the employer: (1) ensures the employer has the correct SSN for the individual; (2) allows SSA to receive correct earnings information for wage reporting purposes; and (3) reduces the delay in the initial SSN assignment and delivery of the SSN information from SSA directly to the employer. It also enables SSA to verify the employer as a safeguard for the applicant's personally identifiable information.

This is especially important to foreign exchange visitors who are in the United States to work during the summer. Often, SSA receives a returned SSN card either because the exchange visitor is no longer in the service area, or because they returned to their country of origin when the card arrives in the mail. When SSA receives earnings information from an employer and those earnings do not have an SSN associated with the wage earner, SSA cannot post the earnings information to that wage earner's record. SSA places the resulting incomplete earnings history in an earnings suspense file.

Individuals applying for an original SSN who would like SSA to release the SSN directly to their employer sign Form SSA-132. Then, the SSA field office (FO) sends the SSN directly to their employer. The majority of individuals who take advantage of this form are in the United States with exchange visitor and student visas.

There are two scenarios for use of Form SSA-132:

- Scenario 1: Individuals applying for an SSN bring Form SSA-132 to an SSA FO at the time of their SSN application. The individual provides all of the employer information on the form. The FO verifies the employer information against SSA employer files. Applicants sign their name and date the form. The FO completes the form with the applicant's assigned SSN and mails the form to the applicant's employer.
- Scenario 2: An applicant comes to the FO to apply for an original SSN without Form SSA-132. The applicant advises SSA that their employer needs the SSN immediately. The FO obtains employer information from the applicant and compares it to SSA employer files to ensure we mail the SSN to the correct employer address. The applicant signs and dates the form. The FO completes the form with the applicant's assigned SSN and mails the form to the applicant's employer. Although, the majority of individuals who take advantage of this option are in the United States with exchange visitor and student visas, we allow any applicant for an SSN to use the SSA-132.

The respondents are individuals applying for an initial SSN who ask SSA to mail confirmation of their application or the SSN to their employers.

3. Use of Information Technology to Collect the Information

This form is available as a fillable PDF on SSA's website. SSA is unable to create an Internet version of this information collection, as this process involves applications for original SSNs and the SSN applicants are unknown to SSA, we cannot electronically authenticate them without comparing the identification information they provide with SSA's existing records. In addition, many of the SSN applicants who use this form are citizens of countries outside the United States and are only here temporarily before returning to their countries of origin. Further, SSA does not provide one-way transmission of SSNs to employers or other third parties at the initial assignment of the SSN. We will reassess this ability if and when technological advances are created that would allow for us to make this collection available via the Internet. In addition, we evaluated this collection for conversion to a submittable PDF, and found it is not suitable for that process either per the issues above.

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 collect this information, a greater number of employers would report earnings information without an SSN for individuals (e.g., exchange visitors holding a visa who obtain temporary employment during the summer). When employers do not report the employee's SSN, SSA is unable to credit that individual's earnings record, and places the earnings in a suspense file. This ultimately could cause errors of incorrect benefit payment amounts to potential future beneficiaries. Because we collect this information on an as-needed basis, we cannot collect it less frequently. There are no technical or legal obstacles that prevent burden reduction.
7. **Special Circumstances**
There are no special circumstances that would cause SSA to collect this information 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 August 23, 2021 at 86 FR 47190, and we received no public comments. The 30-day FRN published on November 18, 2021 at 86 FR 64585. If we receive any comments in response to this Notice, we will forward them to OMB.
9. **Payment of Gifts to Respondents**
SSA provides no payment 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**
Please see the burden chart below:

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)*	Average Wait Time in Field Office (minutes)**	Total Annual Opportunity Cost (dollars)***
SSA-132	124,668	1	5	10,389	\$27.07*	24**	\$1,631,130***

* We based this figure on the average U.S. worker's hourly wages, as reported by Bureau of Labor Statistics data (https://www.bls.gov/oes/current/oes_nat.htm#00-0000).

** We based this figure on the average FY 2021 wait times for field offices, based on SSA's current management information 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.**

In addition, OMB's Office of Information and Regulatory Affairs (OIRA) is requiring SSA to use a rough estimate of a 30-minute, one-way, drive time in our calculations of the time burden for this collection. OIRA based their estimation on a spatial analysis of SSA's current field office locations and the location of the average population centers based on census tract information, which likely represents a 13.97-mile driving distance for one-way travel. We depict this on the chart below:

Total Number of Respondents Who Visit a Field Office	Frequency of Response	Average One-Way Travel Time to a Field Office (minutes)	Estimated Total Travel Time to a Field Office (hours)	Total Annual Opportunity Cost for Travel Time (dollars)****
124,668	1	30	62,334	\$1,687,381

**** We based this dollar amount on the Average Theoretical Hourly Cost Amount in dollars shown on the burden chart above.

Per OIRA, we include this travel time burden estimate under the 5 CFR 1320.8(a)(4), which requires us to provide "time, effort, or financial resources expended by persons [for]...transmitting, or otherwise disclosing the information," as well as 5 CFR 1320.8(b)(3)(iii) which requires us to estimate "the average burden collection...to the extent practicable." SSA notes that we do not obtain or maintain any data on travel times to a field office, nor do we have any data which shows that the average respondent drives to a field office, rather than using any other mode of transport. SSA also acknowledges that respondents' mode of travel and, therefore, travel times vary widely dependent on region, mode of travel, and actual proximity to a field office.

NOTE: We included the total opportunity cost estimate from this chart in our calculations when showing the total time and opportunity cost estimates in the paragraph below.

The total burden for this ICR is **10,389** burden hours (reflecting SSA management information data), which results in an associated theoretical (not actual) opportunity cost financial burden of **\$3,318,511**. SSA does not charge respondents to complete our applications. 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 the 5 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.

13. Annual Cost to the Respondents

This collection does not impose a known cost burden on the respondents.

14. Annual Cost to the Federal Government

The annual cost to the Federal Government is approximately **\$119,938**. 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	\$150
Distributing, Shipping, and Material Costs for the Form	Distribution + Shipping + Material Cost	\$0*
SSA Employee (e.g., field office, 800 number, DDS staff) Information Collection and Processing Time	GS-9 employee x # of responses x processing time	\$116,368
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	\$3,420
Quantifiable IT Costs	Any additional IT costs	\$0*
Total		\$119,938

* 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. It is difficult for us to break down the cost for processing a single form, as field office 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. 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 2018, the burden was 10,867 hours. However, we are currently reporting a burden of 10,389 hours. This change stems from a decrease in the number of responses from 326,000 to 124,668, as well as an increase in the completion time from 2 to 5 minutes. In FY 2020, SSA enumerated approximately 124,668 foreign students and exchange visitors. Absent any mechanism that measures the number of individuals who utilize form SSA-132, we use this figure as the number of respondents for the reporting burden (assuming that every foreign student and exchange visitor needs to complete Form SSA-132, otherwise they would not have their newly requested SSN fast enough). In addition, after review of our burden estimate, we believe 5 minutes is a better estimate to complete Form SSA-132. These figures represent current Management Information data.
- 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.