

**Supporting Statement for SSA-157
Data Exchange Request Form
OMB No. 0960-0802**

A. Justification

1. Introduction/Authoring Laws and Regulations

The Social Security Administration (SSA) maintains approximately 3,000 data exchange agreements and regularly receives new requests from Federal, State, local, and tribal agencies; foreign governments; research entities; as well as private organizations, to share data electronically. SSA engages in various forms of data exchanges from Social Security number verifications to computer matches for benefit eligibility, depending on the requestor's business needs. Section 1106(b) of the *Social Security Act* authorizes SSA to provide information to a requester when the disclosure is authorized by SSA's privacy regulations and the requester reimburses SSA for the information.

2. Description of Collection

SSA requires an instrument that requestors can use to facilitate their request for data from SSA. We use Form SSA-157, Data Exchange Request Form, for this purpose. Every new request for data, or modification to the purpose of an existing data exchange, requires the respondents to complete a new Form SSA-157. Requestors access information about requesting a data exchange with SSA and the Form SSA-157 on the agency Data Exchange website; www.ssa.gov/dataexchange. There are several factors SSA considers in decision-making policy on whether to engage in a data exchange. We must consider the requestor's legal authority to receive the data; our disclosure policies; systems' feasibility; systems' security; and costs to the agency for developing and maintaining the data exchange. When a requestor asks SSA for data, we ask them several questions to determine whether to pursue a data exchange with them. We enumerate those questions in Form SSA-157. The respondents are Federal agencies; State, local, or tribal agencies; foreign governments; research entities; or private organizations that are voluntarily initiating a request for data from SSA and own the information necessary to complete the Form SSA-157.

3. Use of Information Technology to Collect the Information

Form SSA-157 is available as a fillable PDF on SSA's website, which respondents submit to SSA via email.

This collection does not currently have a fully public-facing Internet version, as we prioritized other information collections for full electronic conversions. Given that IT Mod programming is an ongoing, dynamic project, we cannot provide specific timelines for when we will be able to make any particular ICR available via Internet web-based application. We will ultimately convert most existing ICRs to full electronic versions depending on how they fall within our overall IT Mod schema, but this may be unconnected to the PRA approval lifecycle. In the interim, we evaluated this collection for conversion to a submittable PDF.

Given the high volume of conversions we are coordinating and the more urgent nature of some of the other conversions, we ultimately decided not to prioritize this ICR for conversion to fully submittable PDF at this time. When we are able to schedule this form for conversion to a submittable PDF, we will submit a Change Request to OMB to request prior approval.

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-157, respondents would have no way to request a data exchange from SSA. Because we 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 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. We did not consult with the public in the revision this 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**
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)**
State, local, and tribal governments	139	1	45	104	\$42.85*	\$4,456**
Private sector organizations	74	1	45	56	\$42.85*	\$2,400**
Totals	213			160		\$6,856**

*We based this figure on the average Management Analyst hourly salary, as reported by Bureau of Labor Statistics data (www.bls.gov/oes/current/oes131111.htm); the average Business and Financial Operations hourly salary (www.bls.gov/oes/current/oes130000.htm); and the average Epidemiologist hourly salary (www.bls.gov/oes/current/oes191041.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 the average time in minutes listed in the chart above 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 ICR is **106** burden hours (reflecting SSA management information data), which results in an associated theoretical (not actual) opportunity cost financial burden of **\$6,856**. 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 \$213,323. 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	\$375

Distributing, Shipping, and Material Costs for the Form	Distribution + Shipping + Material Cost	\$0*
SSA Employee (e.g., data exchange liaison, OGC staff DCS staff) Information Collection and Processing Time	GS-9 employee x # of responses x processing time	\$209,528
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		\$213,323

* 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. In addition, it is difficult for us to break down the cost for processing a single form, as 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 GS-13 management analyst 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 73 hours. However, we are currently reporting a burden of 160 hours. This change stems from an increase in respondents requesting to use Form SSA-157. In addition, there has been an increase in the burden time per response by 15 minutes to allow for respond corrections after SSA initial review.
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.