

**Supporting Statement for Form SSA-159,
Government to Government Services Online
(GSO) Website Registration;
Form SSA-160, Government to Government Services
Online Website Account Modification/Deletion
20 CFR 401.45
OMB No. 0960-0757**

A. Justification

1. Introduction/Authoring Laws and Regulations

The Social Security Administration (SSA) collects this information by authority of Section 5 *USC 552a (e)(10)* of the *Privacy Act of 1974*, which requires agencies to establish appropriate administrative, technical, and physical safeguards to ensure the security and confidentiality of records. In addition, Sections 5 *USC 552a (f)(2) & (3)* require Federal 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. SSA published Privacy Act rules in the *Code of Federal Regulations (CFR), Subpart B*. We list our procedures for verifying identity at *20 CFR 401.45*, and use Forms SSA-159 and SSA-160 to collect this information.

2. Description of Collection

The Government-to-Government Services Online (GSO) web site allows various external organizations to submit files to a variety of SSA systems and, in some cases, receive files in return. The SSA systems that process data transferred via Government-to-Government services include, but are not limited to, systems responsible for disability processing and benefit determination or termination. SSA has GSO-based data exchange agreements in place with State, local government, and some private sector business entities. The State, local government, and private sector business entity users are registered for GSO access through their facility; and already know about the GSO service; however, if a new user is not familiar with the process, they can contact the GSO via email at UIT.eDataMailbox@ssa.gov, and SSA will email them back informing them how to fill out the form for registration. The SSA sponsor provides the following information on Form SSA-159:

- 1) name;
- 2) address;
- 3) organization name;
- 4) organization ID or RID;
- 5) phone number; and
- 6) email address

The sponsor selects from a list of utilities the new user will need access to. The utility selections are:

- B-Birth

- BL- Black Lung
- DE- Data Exchange
- D- Death
- DDE- Totalization Death Data Exchange
- FF- Fugitive Felon
- PR- Prisons
- OCSE- OCSE Reporting
- SM – Secure Messaging
- SW- Sheltered Workshop
- IAR- Interim Assistance Reimbursement
- Other- Specify Utility in Sponsor Comments

For Data exchange sheltered workshop and secure messaging only, SSA asks them to list all trading partners with whom the user will exchange data, and provide the following information:

- Name
- User ID
- Organization/State

SSA uses the information from Form SSA-159 (Government-to-Government Services Online Website Registration Form) to register the requestor to use the GSO website. SSA then creates a user's account based on this information. SSA provides the user with account information and conducts a walkthrough of the Government-to-Government Services website as necessary. Established organizations submit Form SSA-159 to register additional users as well. The requesting organization can also complete an online Form SSA-160 (Government-to-Government Service Online Website Account Modification/Deletion Form) to modify its online account (e.g., address change). Respondents are State and local government agencies and some private sector business entities.

3. Use of Information Technology to Collect the Information

SSA created a fillable PDF version of Form SSA-159, which is available on our website. 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 and intend to make this conversion within the next 3-6 years. Once we have the submittable PDF ready for implementation, we will submit a Change Request to OMB for prior approval. SSA created a full Internet application version of the SSA-160, which is fully accessible and submittable online through the GSO website. Based on our data, we estimate approximately 100 percent of respondents use the electronic version of the SSA-160.

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-159 and Form SSA-160, we would have no way to verify the requester’s identity or modify online account information for GSO, which would result in SSA’s inability to respond to the GSO-based Internet requests. 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 July 25, 2022, at 87 FR 44180, and we received no public comments. The 30-day FRN published on October 6, 2022 at 87 FR 60721. 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-159	1,354	1	15	339	\$21.13*	\$7,163**
SSA-160	430	1	15	108	\$21.13*	\$2,282**
Totals	1,784			447		\$9,445**

* We based these figures on average Information and Record Keeping Analysts hourly salary, as reported by Bureau of Labor Statistics data (<https://www.bls.gov/oes/current/oes434199.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 **15** 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 ICR is **1,784** burden hours (reflecting SSA management information data), which results in an associated theoretical (not actual) opportunity cost financial burden of **\$9,445**. 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 \$20,739. 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	\$759
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	GS-9 employee x # of responses x processing time	\$160,560

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	\$3,420
Quantifiable IT Costs	Any additional IT costs	\$0*
Total		\$20,739

* 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 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 2019, the burden was 391. However, we are currently reporting a burden of 447 hours. This change stems from an increase in the number of responses from 1,561 to 1,784. There is no change to the burden time per response. Although the number of responses changed, SSA did not take any actions to cause this change.
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.