

Supporting Statement for Forms SSA-187 and SSA-188
Incoming and Outgoing Intergovernmental
Personnel Act Assignment Agreement
5 CFR 334
OMB No. 0960-0792

A. Justification

1. Introduction/Authoring Laws and Regulations

The Intergovernmental Personnel Act (IPA) mobility program provides for the temporary assignment of personnel between the Federal Government and state and local governments, colleges and universities, Indian tribal governments, federally funded research and development centers, and other eligible organizations. The 1970 IPA mobility program regulation, 5 *CFR* 334 of the *Code of Federal Regulations*, was revised effective May 29, 1997. The revisions contained two major changes:

- Agencies are responsible for certifying the eligibility of "other organizations" for participation in the mobility program; and
- Agencies need no longer submit assignment agreements to the Office of Personnel Management (OPM).

Further, OPM instructs agencies to document their IPA assignments. OPM's website, <http://www.opm.gov/programs/ipa/mobility.asp>, displays a list of requirements for inclusion in written agreements. The Social Security Administration (SSA) used this list of requirements to create its own versions of OPM's OF-69 form for IPA assignments, and included all the items from OPM's list, such as name, Social Security number (SSN), current job title, salary, parties to the agreement, position information, type of assignment, etc.

Non-SSA respondents are all parties involved in the IPA. These include external employees and their non-Federal employers. Non-Federal organizations, by definition, include State and local governments, institutions of higher education, Indian tribal governments, and "other" eligible organizations. "Other" organizations, as defined in 5 *USC* 3371(4) of the *United States Code*, may be:

- A national, regional, Statewide, area wide, or metropolitan organization representing member State or local governments;
- An association of State or local public officials;
- A nonprofit organization which offers, as one of its principal functions, professional advisory, research, educational, or development services, or related services to governments or universities concerned with public management; or

- A federally funded research and development center.

The legal authority for IPA assignments is 5 *USC* 3371 – 3375, and regulation 5 *CFR* 334 of the *Code of Federal Regulations*.

2. Description of Collection

OPM created a generic form, the OF-69, for agencies to use as a template when collecting information for IPA assignments. The OF-69 collects the information listed in

<https://www.opm.gov/policy-data-oversight/hiring-information/intergovernment-personnel-act/#url=ArrangingAnAssignment>. These specifics include the name, SSN, job title, salary, classification, and address of the employee enrolled in the program, as well as information regarding the type of assignment, reimbursement arrangement, and an explanation as to how the assignment benefits benefit both SSA and the non-federal organization.

OPM directs agencies to use their own forms for recording IPA agreements, instead of their OF-69. Accordingly, SSA modified the OF-69 to meet its needs, creating one version for incoming employees, the SSA-187, and one for outgoing employees, the SSA-188. SSA collects information on Forms SSA-187 and SSA-188 to document each IPA assignment, and to serve as a written agreement between the agency and non-federal entities. Per IPA regulations set in 5 *CFR* 334, these forms are mandatory for the respondents. Without a signed agreement, the agency may not enter into an IPA agreement. SSA employees collect this information via telephone, regular mail, fax, or email. Respondents are SSA employees and personnel from State and local governments, colleges and universities, Indian tribal governments, federally funded research and development centers, and other eligible organizations who participate in the IPA exchange with the agency. External respondents are officials from the IPA entities (listed in Number 1 above) who have authority to enter into IPA agreements.

3. Use of Information Technology to Collect the Information

SSA created fillable-signable PDF versions of Forms SSA-187 and SSA-188 on our website. When an individual needs to complete the form, SSA directs them to download it from the website or email it to the respondent directly. The form is fully fillable, including all signature fields, allowing for respondents to fully complete the form and submit it electronically. Based on our data, we estimate approximately 100% of respondents under this OMB number use the fillable PDF versions.

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 potentially affects small entities. If SSA did not impose this burden, the agency would be unable to engage in IPA assignments with those entities and vice versa. SSA employees minimize the burden by carefully reviewing the forms and ensuring they only ask small entities to complete relevant and necessary questions.
- 6. Consequence of Not Collecting Information or Collecting it Less Frequently**
If SSA did not collect this information and authorize temporary assignment of employees between Federal Government and State, local, and Indian tribal governments, institutions of higher education and other eligible organizations, the agency would be in violation of federal regulation *5 CFR 334*. Since we only collect the information once per assignment, 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 November 4, 2020 at 85 FR 70216, and we received no public comments. The 30-day FRN published on February 4, 2021 at 86 FR 8246. If we receive any comments in response to this Notice, we will forward them to OMB.
- 9. Payment or Gifts to Respondents**
Per the IPA regulations, non-Federal organizations and SSA may negotiate cost-sharing arrangements and document the mutually agreed upon terms within the IPA agreement. SSA may pay all, some, or none of the costs associated with an assignment. Costs may include employee basic pay; supplemental pay; fringe benefits; travel; and relocation. Since assignments need to be mutually beneficial to both organizations, cost-sharing provisions reflect the mutual benefit. Because cost-sharing provisions vary based on the agreement, we do not include any specific amounts here.
- 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)*	Total Annual Opportunity Cost (dollars)**
Non-Federal employee	3	1	30	2	\$50.00*	\$100**
Non-Federal employer signers	12	1	5	1	\$50.00*	\$50**
Totals	15			3		\$150**

* We based this figure on averaging the average of Postsecondary Education Administrators and Executive Branch Management Analysts hourly wages, as reported by Bureau of Labor Statistics data (<https://www.bls.gov/oes/current/oes119033.htm> & <https://www.bls.gov/oes/current/oes131111.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.**

The total burden for this ICR is 3 hours (reflecting SSA management information data), which results in an associated theoretical (not actual) opportunity cost financial burden of \$150. SSA does not charge respondents to complete its IC forms.

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 \$108,016. 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	\$8,920
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	GS-9 employee x # of responses x processing time	\$49,096

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	\$0
Quantifiable IT Costs	Any additional IT costs	\$0
Other	Cost sharing per IPA agreements	\$50,000
Total		\$108,016

* 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. 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 2017, the burden was 7 hours. However, we are currently reporting a burden of 3 hours. This change stems from a decrease in the number of responses from 30 to 15, due to eligible organizations who participate in the IPA exchange choosing to conduct fewer exchanges with SSA over the past few years. 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. 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

SSA is not requesting an exception to the requirement to display an 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.