

Supporting Statement for Form SSA-731
Notice to Electronic Information Exchange Partners to Provide Contractor List
OMB No. 0960-0820

A. Justification

1. Introduction/Authoring Laws and Regulations

Federal standards in the Privacy Act of 1974, E-Government Act of 2002, National Institute of Standard (NIST) SP 800-53-4, require the Social Security Administration (SSA) to maintain oversight of the information it provides to Electronic Information Exchange Partners (EIEPs). EIEPs obtain SSA data for the administration of federally funded; state-administered; and state funded programs. SSA's responsibility to monitor and protect PII extends to the data SSA shares with other Federal and State agencies and private organizations through the Computer Matching and Privacy Protection Act and the Information Exchange Agreements (IEA). Under the terms of the State Transmission Component (STC) IEA and agency IEA, EIEPs agree to comply with Electronic Information Exchange Security Requirements and Procedures for State and Local Agencies Exchanging Electronic Information with the Social Security Administration. SSA's requirements document, also known as the Technical Systems Security Requirements (TSSR), provides that all agencies using SSA data must ensure that SSA information is not processed, maintained, transmitted, or stored in, or by means of, data communications channel, electronic devices, computers, or computer networks located in geographic or virtual areas not subject to U.S. law.

2. Description of Collection

As part of our requirements, the data collection process begins when the Data Exchange Coordinator (DEC) notifies the EIEP of the request prior to the triennial security assessment. The process ends when the form is sent to the DEC as an artifact of the triennial security assessment. The form becomes part of the triennial security assessment. SSA requires any organization with an electronic data exchange agreement to provide their SSA Regional Office contact with a current list of contractors or agents who have access to SSA data, upon request. SSA uses Form SSA-731, Notice to Electronic Information Exchange Partners to Provide Contractor List to collect this. The respondents are State, local, or tribal agencies who exchange electronic information with SSA.

There are no potential (or known) Psychological Costs to the respondents regarding learning about and completing the form. The EIEP data collection request obtains SSA data for the administration of federally funded; state administered; and state funded programs. The form is required as part of the triennial assessment process to ensure that SSA information is not processed, maintained, transmitted, or stored in, or by means of, data communications channel, electronic devices, computers, or computer networks located in geographic or virtual areas not subject to U.S. law.

The respondents are the EIEPs.

3. **Use of Information Technology to Collect the Information**
In accordance with the agency’s Government Paperwork Elimination Act plan, SSA created an Internet version of form SSA-731. Based on our data, we estimate approximately 100% of respondents under this OMB number use the electronic version.
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 significantly 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-731, stakeholders could potentially have contractors outside the United States misusing SSA’s data. 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 June 1, 2023, at 88 FR 35990, and we received no public comments. The 30-day FRN published on September 8, 2023, at 88 FR 62139. 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 maintenance of 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**
This information collection does not contain any questions of a sensitive nature.
12. **Estimates of Public Reporting Burden**
The following chart shows the annual public reporting burden for the SSA-731:

| Modality of Completion | Number of Respondents | Frequency of Response | Average Burden Per Response | Estimated Total Annual | Average Theoretical Hourly Cost | Total Annual Opportunity Cost |
|------------------------|-----------------------|-----------------------|-----------------------------|------------------------|---------------------------------|-------------------------------|
|------------------------|-----------------------|-----------------------|-----------------------------|------------------------|---------------------------------|-------------------------------|

| | | | | | | |
|---------|-----|---|-----------|----------------|-------------------|-------------|
| | | | (minutes) | Burden (hours) | Amount (dollars)* | (dollars)** |
| SSA-731 | 300 | 1 | 20 | 100 | \$29.76* | \$2,976** |

* We based this figure on average State, local and tribal government worker’s salaries.

** 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 calculated the following Learning Cost time burden based on the estimated time and effort we expect respondents will take to learn about this program, its applicability to their circumstances, and to cover any additional research we believe respondents may need to take to understand how to comply with the program requirements (beyond reading the instructions on the collection instrument)

| Total Number of Respondents | Frequency of Response | Estimate Learning Cost (minutes) | Estimated Total Annual Burden (hours) | Total Annual Learning Cost (dollars)** |
|-----------------------------|-----------------------|----------------------------------|---------------------------------------|--|
| 300 | 1 | 3 | 15 | \$446***** |

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

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.

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 **average time in minutes shown in our chart** above accurately shows the average burden per response for learning about the program; receiving notices as needed; reading and understanding instructions; gathering the data and documents needed; answering the questions and completing the information collection instrument; scheduling any necessary appointment or required phone call; consulting with any third parties (as needed); and waiting to speak with SSA employees (as needed). Based on our current management information data, the current burden information we provided is accurate. The total burden for this ICR is **100** burden hours (reflecting SSA management information data), which results in an associated theoretical (not actual) opportunity cost financial burden of **\$3,422**. 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 **\$252,503**.

| Description of Cost Factor | Methodology for Estimating Cost | Cost in Dollars* |
|---|--|-------------------------|
| Designing, Printing, and Distributing the Form | Design Cost + Printing Cost + Distribution Cost | \$503 |
| 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 | \$138,000 |
| 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 | \$114,000 |
| Quantifiable IT Costs | Any additional IT costs | \$0 |
| Total | | \$252,503 |

* 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. We do not track design costs or upkeep costs (as these are based on employee time and may vary from collection to collection). 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. Finally, SSA prefers not to provide breakdowns of estimated payment to employees who process these items for a variety of reasons (only one of which is that it is not possible to do this entirely accurately).

15. **Program Changes or Adjustments to the Information Collection Request**

There are no changes to the public reporting burden.-

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 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.