

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 that 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 working 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 must sign Form SSA-132. The form is not required to receive an SSN and there is no requirement to complete the form. However, if the individual wants their employer notified of their SSN in expedited fashion, they may complete this form to receive that service. Subsequently, the SSA field office (FO) sends the SSN directly to their employer. Most individuals who take advantage of this form are in the United States with exchange visitor and student visas.

Respondents learn that they need an SSN from either their employer or their school. Their employer or school will often advise them of the SSA-132 at that time to ensure they take the action of completing the form to ensure faster receipt of the SSN by the employer/school. Sometimes, the employer will provide the individual with the SSA-132, but often, the individual receives the form from SSA field office personnel. Additionally, the respondent may learn of the SSA-132 at the SSA field office when they are applying for an SSN and express a desire to have the SSN provided to the employer/school as quickly as possible. SSA is constantly reviewing our ability to make processes easier. In fact, the SSA-132 is in place for the specific purpose of making the SSN application process easier by allowing applicants to provide access to their SSN to employers/schools more quickly.

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 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.

We identified the following psychological cost based on the requirements for this information collection:

- **Psychological Cost #1**:
 - **Requirement for the Program**: Respondents may experience a psychological cost when they learn they must complete this additional form to receive expedited access to their SSN by employers/schools. The SSA-132 requires the employer's name and address and the respondent's name and signature allowing SSA to quickly provide the SSN to the employer/school once assigned to the applicant.

- o **Psychological Cost:** The respondent may perceive these questions as an extra burden which could cause frustration. However, SSA requires the minimal amount of information to complete the SS-132, and we note that this additional service will ultimately ensure the SSN is available more quickly to the employer/school, which will mitigate the overall psychological cost.

We understand this psychological cost may frustrate the respondent because they will need to fill out this additional form to receive the expedited service. However, we do not require completion of this form for the assignment of an SSN and only call for its use upon respondent's request for expedited notification of an SSN. Thus, we believe the psychological cost is minimal, and will likely have the overall impact of mitigating and minimizing overall psychological costs associated with the SSN application process. We have taken this potential psychological cost into account and included this analysis while calculating our burden in #12 below.

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 technological advances are created that would allow for us to make this collection available via the Internet, mitigating the issues mentioned above. While this instrument may become available online in the future, currently this initiative is not on the Agency's future prioritization road map and will not likely be available online in the next 3-6 years. 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 related 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 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 November 6, 2024 at 89 FR 88105, and we received no public comments. The 30-day FRN published on January 8, 2025 at 90 FR 1588. 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**

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	361,902	1	5	30,159	\$31.48*	24**	\$5,506,482***

* 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 2024 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 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)****
361,902	1	30	180,951	\$5,696,337****

**** 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.

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)*****
361,902	1	2	12,063	\$379,743*****

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, and the time estimate included in the Paperwork Reduction Act on the form itself, we believe that 2 minutes 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 **30,159** burden hours (reflecting SSA management information data), which results in an associated theoretical (not actual) opportunity cost financial burden of **\$11,582,562**. SSA does not charge respondents to complete our applications.

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 **\$969,848**. 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)	GS-9 employee x # of responses x processing time	\$966,278

staff) Information Collection 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	\$3,420
Quantifiable IT Costs	Any additional IT costs	\$0*
Total		\$969,848

* 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 2021, the burden was 10,389 hours. However, we are currently reporting a burden of 30,159 hours. This change stems from an increase in the number of responses from 124,668 to 361,902. In FY 2023, SSA enumerated approximately 361,902 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). SSA did not change the burden per response.

* Note: The total burden reflected in ROCIS is **367,934**, while the burden cited in #12 of the Supporting Statement is **30,159**. This discrepancy is because the ROCIS burden reflects the following components: field office waiting time + a rough estimate of a 30-minute, one-way, drive burden + learning costs. In contrast, the chart in #12 of the Supporting Statement reflects actual 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

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.