Supporting Statement for Form SSA-120
Application for Access to SSA Systems
20 CFR 401.45, 26 CFR 31.6011(b)2, and 26 CFR 31.61091
OMB No. 0960-0791

A. <u>Justification</u>

1. Introduction/Authoring Laws and Regulations

Section *205(a)* of the S*ocial Security Act (Act)* provides the Commissioner of Social Security the authority to establish procedures for verifying identity. *20 CFR 401.45* of the *Code of Federal Regulations*, *Subpart B* provides procedures for verifying identity. The Social Security Administration (SSA) collects this information by authority of the *Privacy Act of 1974,* at *5 U.S.C. 552A (e)(10)*, of the *United States Code* which requires agencies to establish appropriate administrative, technical, and physical safeguards to ensure the security and confidentiality of records. Sub-section *5 U.S.C. 552A (f)(2)&(3)* requires 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. *Executive Order (E.O.) 10450* authorizes the collection of the data SSA requires on Form SSA-120. In addition, *E.O. 9397, 26 CFR 31.6011(b)2,* and *26 CFR 31.61091* provide specific authority for the use of Social Security numbers. *44 U.S.C. 3553* of the *Federal Information Security Modernization Act of 2014* amends the *44 U.S.C. 3543* of the *Federal Information Security Management Act (FISMA) of 2002*, state the authority and functions of the Director and the Secretary for developing and overseeing the implementation of policies, principles, standards, and guidelines on information security.

2. Description of Collection

SSA uses Form SSA-120 and the accompanying electronic version to allow authorized users to apply for access to SSA's information systems. SSA requires supervisory approval, and local or component security officer review, prior to granting access.

An SSA external partner, such as a manager or Contracting Officer Representative (COR), notifies the respondent of the requirement to complete the electronic version of the SSA-120 . If SSA's systems are down, we require the employee or contractor to complete, sign and return the paper version of The SSA-120 to SSA's external partner.

SSA's external partner scans the paper version of the SSA-120, and emails it to SSA's Cybersecurity Access Administration. SSA's Cybersecurity Access Administration retains the SSA-120 in accordance with agency records policy. The SSA-120 serves as official documentation authorizing the Cybersecurity Access Administration to assign SSA employees or contractors the appropriate systems access.

Note: Because SSA employees are Federal workers exempt from the requirements of the Paperwork Reduction Act, the burden we list in #12 below is only for SSA contractors.

There are no psychological costs associated with Form SSA-120, because the form only asks routine information, to allow respondents to access SSA information systems.

The respondents are SSA employees and non-Federal employees (contractors) who require access to SSA systems to perform their jobs.

3. Use of Information Technology to Collect the Information

SSA created an electronic version of the SSA-120 called Systems Access Management (SAM). We use SAM to collect one hundred percent of the data we use. We only use the paper Form SSA-120 when SAM is not available. SAM is a process for initial access, access granting, access approval, access continuation, and access removal under the agency's Government Paperwork Elimination Act (GPEA).

SSA also created a fillable PDF version of this form for respondents to download, complete, print, and submit to SSA. The PDF version also supports eSignatures for those who are not using SAM to submit Form SSA-120 to us.

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 use Form SSA-120, or the Systems Access Management (SAM) application, we would not have a way to track an individual's access to SSA's information systems and resources, nor would we be able to assure the confidentiality, integrity, and availability of SSA's information technology resources. 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 May 26, 2026, at 91 FR 30774, and we received no public comments. The 30-day FRN published on July 31, 2026, at 91 FR 48475. 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 development revision 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

The information collection does not contain any questions of a sensitive nature.

12. Estimates of Public Reporting Burden

Please see the burden chart below:

Method of Completion	**Number of Respondents**	**Frequency of Response**	**Average Burden Per Response (minutes)**	**Estimated Total Annual Burden (hours)**	**Average Theoretical Cost Amount (dollars)***	**Total Annual Opportunity Cost (dollars) ****
SSA-120 (paper version)	685	1	2	23	$55.15*	$1,268**
SSA-120 (Internet version)	1,482	1	2	49	$55.15*	$2,702**
Total	**2,167**			**72**		**$3,970****

*We based these figures on the average SSA contractor's hourly wages based on SSA's management information.

** 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 did not include travel time as per our current management information data, as the majority of those who complete this form do so electronically through SAM. For those who use the PDF version, most of them are already in the office (per their expected work day), so they do not travel to submit this form. Should this change in the future, we will include the language and chart for travel time to a field office.

There are no learning costs associated with the SSA-120, because respondents are only providing their work location information to get access to SSA's systems.

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 **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 **72** burden hours (reflecting SSA management information data), which results in an associated theoretical (not actual) opportunity cost financial burden of **$3,967**. 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 **$1,476,730**. 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	$380
Distribution, 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	$108,350
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	$1,368,000
Quantifiable IT Costs	Any additional IT costs	$0*
Total		**$1,476,730**

* 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. 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

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

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.