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. <u>Justification</u>

1. Introduction/Authoring Laws and Regulations

The Intergovernmental Personnel Act (IPA) mobility program allows personnel temporary assignment 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 Office of Personnel Management (OPM) revised the 1970 IPA mobility program regulation, *5 CFR 334* of the *Code of Federal Regulations*, effective May 29, 1997. The revisions included two major changes:

- Agencies certify 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, lists the 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; SSA-188 for Outgoing Assignments and SSA-187 for Incoming Assignments. These forms include 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, and more.

All parties involved in the IPA serve as non-SSA respondents. These parties 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. *5 USC 3371(4)* of the *United States Code* defines "other" organizations as:

- 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 the OF-69. Accordingly, SSA modified the OF-69 to meet its needs and created 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. IPA regulations in *5 CFR 334* require respondents to use these forms. Without a signed agreement, the agency cannot enter into an IPA agreement. SSA collects this information to establish an IPA agreement. SSA employees collect this information via telephone, regular mail, fax, or email. SSA employees offer consultative services to make the information collection process easier.

We did not include psychological cost in the analysis because respondents are clearly informed in advance that they will need to complete an agreement. The form does not request any potentially distressing or sensitive information. As a result, respondents are not expected to experience discomfort, anxiety, or other psychological impacts while completing the collection, and no psychological cost is anticipated.

The respondents are 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 SSA.

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 either directs them to download it from the website or emails the form directly to the respondent. The form includes fully fillable fields, including all signature fields, which allows respondents to complete and submit the form electronically via email. Based on our data, 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 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**

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 4*2 U.S.C. 1306*, *20 CFR 401* and 4*02, 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) **
Non-Federal employee	3	1	30	2	$57.78*	$116**
Non-Federal employer signers	12	1	5	1	$57.78*	$58**
Totals	**15**			**3**		**$174****

* We based this figure on averaging the average of Postsecondary Education Administrators and Management Analysts hourly wages, as reported by Bureau of Labor Statistics data (Occupational Employment and Wage Statistics).

** 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 because these forms are electronically submittable and all respondents submit them electronically. Therefore, we did not include a travel burden for the respondents.

We did not include a separate Learning Cost for this information collection, as we include the Learning Cost in the burdens listed in the chart above.

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 **5 and 30** minutes, depending on the form, accurately shows the average burden per response for learning about the program; reading and understanding instructions; gathering the data needed; answering the questions and completing the information collection instrument; scheduling any required phone call; and consulting with any third parties (as needed). Based on our current management information data, the current burden information we provided is accurate. The total burden for this ICR is **3** burden hours (reflecting SSA management information data), which results in an associated theoretical (not actual) opportunity cost financial burden of **$174**. 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 **$111,436**. 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
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	$49,096
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*
Other	Cost sharing per IPA agreements	$50,000
Total		**$111,436**

* 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

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 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.