

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

The Federal standards Privacy Act of 1974; E-Government Act of 2002; and the National Institute of Standards and Technology (NIST) Special Publications 800-53-4 require the Social Security Administration (SSA) to maintain oversight of the information we provide to Electronic Information Exchange Partners (EIEPs). EIEPs obtain SSA data for the administration of federally funded and state-administered programs. SSA has a responsibility to monitor and protect the personally identifiable information we share with other Federal and State agencies, as well as with local or tribal agencies through the Computer Matching and Privacy Protection Act and the Information Exchange Agreements (IEA). Accordingly, under the terms of the State Transmission Component (STC), EIEPs agree to comply with Electronic Information Exchange security requirements and procedures for State and local Agencies exchanging electronic information with SSA. SSA's Technical Systems Security Requirements document provides that all agencies using SSA data must ensure SSA information is not processed; maintained; transmitted; or stored in electronic devices; computers; or computer networks located in geographic or virtual areas not subject to U.S. law. In addition, per our Technical Systems Security Requirements, agencies using SSA data may also not access or transfer it by means of a data communications channel.

2. Description of Collection

SSA conducts tri-annual compliance reviews of all State and local agencies, and Tribes with whom we have an IEA, to verify appropriate security safeguards remain in place to protect the confidentiality of information SSA supplies. As part of this review, SSA requires any organization with an electronic data exchange agreement to provide SSA 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 the list of current contractors.

As part of our requirements, the data collection process for the list of contractors or agents begins when the Data Exchange Coordinator (DEC) notifies the EIEP of the request before the triennial security assessment and sends a link to the electronic Form SSA-731 to the EIEP to complete. The process ends when the EIEP sends the completed form to the DEC as an artifact of the assessment, where it becomes part of the triennial security assessment record.

As the requirement for the EIEPs to submit a current list of contractors or agents who have access to SSA data upon request is part of the IEA, the EIEPs agree to submit Form SSA-731 to SSA when they sign the IEA. Therefore, since this requirement is part of our contract with the EIEPs, the EIEPs have not indicated any psychological costs associated with this information collection. Rather, respondents complete the form as part of the

routine triennial security assessment process to document that SSA information is not processed, maintained, transmitted, or stored through data communications channels, electronic devices, computers, or computer networks located in geographic or virtual areas outside U.S. legal jurisdiction.

The respondents are Federal agencies and State, local, or tribal agencies who exchange electronic information with SSA.

3. Use of Information Technology to Collect the Information

In accordance with SSA's Government Paperwork Elimination Act plan, SSA created an Internet version of Form SSA-731. Based on our current management information data, SSA estimates that 100 percent of the respondents use the electronic version. SSA also removed the signature requirement, allowing respondents to complete and submit the fillable PDF electronically without printing and signing the form, for the rare cases when the Internet version of the form is not available.

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 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 August 27, 2026, at 91 FR 55421, and we received no public comments. The 30-day FRN published on October 29, 2026, at 91 FR 68213. 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-731	300	1	20	100	\$ 33.54 *	\$3,354**

* We based this figure on an average U.S. citizen's hourly salary (\$33.54), 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 individuals; rather, these are theoretical opportunity costs for the additional time respondents will spend to complete the information collection. **There is no actual charge to respondents to complete the information collection.**

We did not include travel time as per our current management information data, all of the respondents who complete form SSA-731, submit it back to us electronically.

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	\$503***

***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 **20 minutes** accurately shows the average burden per response for reading the instructions, gathering the facts, and answering the questions. 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 **\$3,857**. 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 **\$123,135**. 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	\$545
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	\$0***
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	\$122,590
Quantifiable IT Costs	Any additional IT costs	\$0*
Total		\$123,135

* We have inserted a \$0 amount for cost factors that do not apply to this collection.

**There is no cost to the federal government as the respondents complete and electronically submit form SSA-731; therefore, we are using a \$0 cost for this.

***We have no processing cost for this information collection as the respondents submit it entirely online with no SSA technician involvement.

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 our technicians process several forms at once, and the time it takes to do so can vary greatly.

Also, so many employees have a hand in each aspect of our forms. 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.

* Note: The total burden reflected in ROCIS is **115**, while the burden cited in #12 of the Supporting Statement is **100**. This discrepancy is because the ROCIS burden also reflects the 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

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.