Supporting Statement for Form SSA-157
Data Exchange Request Form
OMB No. 0960-0802

A. Justification

1. Introduction/Authoring Laws and Regulations

The Social Security Administration (SSA) maintains, per our most current MI data, 1,023 data exchange agreements, and regularly receives new requests from Federal, State, local, and tribal agencies; foreign governments; research entities; as well as private organizations, to share data electronically. SSA engages in various forms of data exchanges from Social Security number verifications to computer matches for benefit eligibility, depending on the requestor's business needs. Section *1106(b)* of the *Social Security Act* authorizes SSA to provide information to a requester when the disclosure is authorized by SSA's privacy regulations and the requester reimburses SSA for the information.

2. Description of Collection

When requestors choose to request data from SSA through a data exchange, SSA uses Form SSA-157, Data Exchange Request Form, to enable requestors to submit one-time requests for data and to meet regulatory compliance requirements. Requestors must complete a new Form SSA-157 for each new data request or any change in the purpose of an existing data exchange. They learn about data exchanges and SSA's exchange policies, as well as information about requesting a data exchange and Form SSA-157, through SSA's Data Exchange website at www.ssa.gov/dataexchange.

SSA considers several factors when deciding whether to establish a data exchange, including the requestor's legal authority to receive the data, SSA disclosure policies, system feasibility and security, and the costs of developing and maintaining the exchange. When a requestor seeks data from SSA, SSA asks a series of questions listed on Form SSA-157 to determine whether to pursue a data exchange.

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

Psychological Cost #1:

- **Requirement for Program:** Form SSA-157 requests a significant amount of data from the requestor about the nature of the data request, the requestor's legal authority to request the data from SSA, a full listing of the individuals from the requesting organization who will have access to the provided data, the security of the organization's systems, and security of the requested data within the organization's systems, as well as some other additional information specific to state agencies or for data exchanges specific to research or statistical purposes. In most cases, SSA requests the respondent to submit this information through short-answer questions on Form SSA-157.

- **Psychological Cost:** Respondents may find completing Form SSA-157 daunting or time consuming, which may delay their completion and submission of the form, or may cause them to choose not to complete it at all.

We understand these psychological costs may cause respondents to delay their completion of the information collection or cause them to abandon the information collection entirely. However, we also note that initiating the request for a data exchange with SSA is a voluntary process, and respondents provide information within their knowledge, such as their legal authority to receive the data, the purpose of the request, and relevant system or security details. As the respondents choose to complete this form to initiate a data exchange with SSA, and because they understand the need for SSA to use this information to determine whether it can establish or modify a data exchange in accordance with applicable law, privacy requirements, security standards, system feasibility, and cost considerations, the respondents have not commented to SSA on these potential psychological costs for completing this information collection.

Respondents include Federal, State, local, and tribal agencies; foreign governments; research entities; and private organizations that voluntarily request data from SSA and possess the information needed to complete Form SSA-157.

3. Use of Information Technology to Collect the Information

SSA uses Form SSA-157, Data Exchange Request Form, and its electronic version, the Data Exchange Request Form (DXRF), to collect information from agencies, governments, research entities, and private organizations that voluntarily request a data exchange with SSA. Requestors may complete the fillable PDF version of Form SSA-157, available on SSA's website, and submit it to SSA by email. The form does not require a signature. Alternatively, requestors may use the DXRF online platform to submit their requests to SSA electronically.

The DXRF collects the same information as Form SSA-157 and provides an online interface that streamlines the submission process. The application performs data-entry and error validations, displays only the sections relevant to the requestor's responses, and allows requestors to upload supporting documentation. After a requestor completes the online form, the system transfers the information into a PDF version of Form SSA-157 and sends it to SSA's Data Exchange team for processing. The system also allows requestors to download a copy of the completed form for their records. These electronic submission options support faster processing of data exchange requests and align with SSA's Government Paperwork Elimination Act plan. Based on available data, SSA estimates that approximately 100 percent of respondents use the electronic version of the form.

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 request the information on Form SSA-157, respondents would have no means of initiating and requesting a data exchange with SSA. Because we collect the information only 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 September 24, 2026, at 91 FR 60685, and we received one public comment. We summarized this public comment and addressed it in the attached Addendum.

The 30-day FRN published on November 25, 2026, at 91 FR 76295. 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) *****
State, local, and tribal	188	1	480	1,504	$ 49.18*	$73,967**

governments						
Private sector organizations	80	1	480	640	$49.18*	$31,475**
Totals	**268**			**2,144**		**$105,442****

* We based this figure on the combined average State, local, and tribal agencies' and foreign governments' Management Analyst's hourly salary ($54.71), the average private organizations' Business and Financial Operations worker's hourly salary ($45.78), and the average Epidemiologist's hourly salary ($47.06) 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 because our current management information data, as stated in Item #3 of the Supporting Statement, shows that 100 percent of respondents use the electronic version of the form. In addition, for those respondents who choose to complete and submit the fillable PDF version of the SSA-157, the do so via email (and do not submit it to SSA in person).

Because respondents voluntarily research and initiate the request for a data exchange with SSA, we include the learning cost burden within the overall burden for completing the form shown in the chart above, and did not calculate any additional learning cost burden.

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 **480** 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 **2,144** burden hours (reflecting SSA management information data), which results in an associated theoretical (not actual) opportunity cost financial burden of **$105,442**. 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 **$108,261**. 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	$375
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-13 employee x # of responses x processing time	$107,886
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	$0***
Quantifiable IT Costs	Any additional IT costs	$0*
Total		**$108,261**

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

**There is no cost to the federal government because requestors can complete the fillable PDF version of Form SSA-157, available on SSA's website, and submit it to SSA by email. Alternatively, requestors can use the DXRF online platform to submit requests electronically. Therefore, we are assigning a $0 cost for this.

*** Since we completed the development of this information collection, we no longer track the overall costs for maintaining it. If we update the information collection, we will include a cost here at that time.

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 SSA's Data Exchange team for processing a single form, and the time it takes to do so can vary greatly per respondent. Also, 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 GS-13 management analyst 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 cleared the this ICR in 2024, the burden was 1,704 hours. However, we are currently reporting a burden of **2,144** hours. This change stems from an increase in respondents requesting to use Form SSA-157 and an increase in total DXRF applications. There is no change to the burden time per response. Although the number of responses changed, SSA did not take any actions to cause this change. These figures represent current management information data.

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.