

## **Supporting Statement for Social Security Benefits Application**

### **Internet Social Security Benefits Application (ISBA) Application for Retirement Insurance Benefits (SSA-1) Application for Wife's or Husband's Insurance Benefits (SSA-2) Application for Disability Insurance Benefits (SSA-16)**

**20 CFR 404.310-.311, 404.315-.322, 404.330-.333, 404.601-.603,  
404.1501-.1512, Subpart D, Subpart G & Subpart P**

**OMB No. 0960-0618**

#### **A. Justification**

1. *Section 202(a) of the Social Security Act (the Act) provides for the payment of monthly benefits to an insured individual if certain conditions are met, including the requirement to file an application. Sections 202(b) and 202(c) of the Act provides for payment of monthly benefits to wives and husbands of insured workers. Section 223(a) provides for payment of monthly benefits to insured workers who are disabled. Those sections also require eligible individuals to file an application.*

The Internet Social Security Benefits application (ISBA), which is available at the Social Security Administration's (SSA) Internet site, is one application that the Commissioner of Social Security will prescribe to meet the application filing requirement. Also see section 205(a) of the Act. ISBA can be used to apply for Retirement Insurance Benefits (RIB), Disability Insurance Benefits (DIB) and Spouse's Insurance Benefits based on age. In addition, SSA offers the public the option to file an application through the traditional paper process and the Modernized Claims System (MCS), which is a direct input process conducted by SSA representatives. Through these collections SSA gathers only information relevant to the individual applicant's circumstances. The hardcopy paper forms are specific to their titled application program.

*20 CFR 404.310-404.311, 20 CFR 404.330-404.333 and 20 CFR 404.601-404.603 set out the regulatory requirements for implementing sections 202(a), (b) and (c) and 223(a) of the Act. One of the requirements is the filing of an application so that a determination may be made on the applicant's eligibility for monthly benefits. In order to make such a determination, it is necessary to elicit from the applicant information about the date and place of birth, current and*

recent work, receipt of non-covered pensions, etc. SSA gathers only information relevant to the individual applicant's circumstances. For example, if the applicant indicates that he/she has never had military service, we will not ask for detailed information about such service. *Sections 20 CFR 404.1501-.1512* explain how a medical determination of disability is to be made. *Sections 20 CFR 404.315-.322* provide the other requirements that must be met for entitlement to disability insurance benefits. *P.L. 108-203, the Social Security Protection Act of 2004 amends section 202 (x) of the Act.* This law prohibits Title II benefits to persons fleeing prosecution, custody, or confinement after conviction and to persons violating probation or parole.

2. The following, by collection method, is a description of the various collections contained within this clearance request:

#### ISBA

SSA uses information collected by ISBA to entitle individuals to RIB, DIB and/or spouse's benefits. In the ISBA collection, respondents are guided through a series of collection screens depending on the Internet and the type of application filed.

#### MCS

MCS is an electronic collection method that mirrors the hardcopy application formats. Guided by the MCS collection screens, an SSA representative interviews the applicant and inputs the information directly into SSA's application database. MCS prompts the representative with the required questions based on the type of application being filed and circumstances of the applicant. These prompts facilitate a more complete initial application. MCS also propagates identity and like information to other screens in the application. We believe that using MCS improves accuracy in recording responses, results in fewer recontacts to clarify an applicant's response, and reduces overall interviewing time.

#### Paper Application Forms

##### SSA-1

The SSA-1 is used by SSA to determine an individual's entitlement to retirement insurance benefits.

##### SSA-2

The information on the SSA-2 is used by SSA to determine whether the applicant can be entitled to wife's or husband's insurance benefits.

#### SSA-16

The information gathered on Form SSA-16-F6 is used to determine an individual's entitlement to disability insurance benefits.

3. The information collected by ISBA is completely automated and is compliant with the Government Paperwork Elimination Act (GPEA). Respondents provide information by completing a series of screens on a personal computer. Responses are submitted to SSA electronically. SSA has developed an electronic signature process. Applicants are no longer required to print, sign and mail a statement of allegations related to their eligibility (see supplemental document). However they are still required to submit supporting documentary evidence. With the advent of MCS and ISBA approximately 99% of the data collection in claims for retirement benefits is electronic.

The information collected on the paper forms SSA-1, SSA-2-F6 and SSA-16 is also collected electronically through SSA's MCS.

4. The information is collected once from the applicant. SSA will allow applicants the option of applying for benefits using ISBA, the equivalent paper forms (i.e., SSA-1, SSA-2 and SSA-16) or through a personal interview. For those respondents with U.S. military service, ISBA also encompasses information currently collected on Form SSA-2512 (OMB No. 0960-0120). For respondents who have filed for workers' compensation or a public disability benefit, ISBA also encompasses information currently collected on Form SSA-546 (OMB No. 0960-0247). There are no other forms used by SSA that collect data similar to that collected here.
5. This collection does not have a significant impact on a substantial number of small businesses or other small entities.
6. The consequences of not collecting this information would be to preclude entitlement to an otherwise eligible individual. Collection of the information takes place based upon the need of the applicant to apply for benefits. It could not be collected less frequently. There are no technical or legal obstacles that prevent burden reduction.

7. There are no special circumstances that would cause this information collection to be conducted in a manner that is not consistent with 5 CFR 1320.5.
8. <sup>1</sup>The 60-day advance Federal Register Notice was published on February 20, 2007, at 72 FR 7809, and SSA has received no public comments. The second Notice was published on April 23, 2007 at 72 FR 20154 and SSA has received no public comments. There have been no outside consultations with members of the public.
9. SSA provides no payment or gifts to the respondents.
10. The information requested is protected and held confidential 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.

In addition, information collected through ISBA by SSA is protected by our Privacy Policy for Internet Services that ensures the confidentiality of all information provided by the requester. Our Internet privacy policy is:

- You do not need to give us personal information to visit our site.
- We collect personally identifiable information (name, SSN, DOB or E-mail) only if specifically and knowingly provided by you.
- Personal identifying information you provide will be used only in conjunction with services you request as described at the point of collection.
- We sometimes perform statistical analyses of user behavior in order to measure customer interest in the various areas of our site. We will disclose this information to third parties only in aggregate form.
- We do not give, sell, or transfer any personal information to a third party.

Additionally, SSA will ensure the confidentiality of the requester's personal information in several ways:

- All electronic requests will be encrypted using the Secure Socket Layer (SSL) security protocol. SSL encryption prevents a third party from reading the transmitted data even if intercepted. This protocol is an industry standard, and is used by banks such as Wells Fargo and Bank of America for Internet banking.

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<sup>1</sup> **Please Note:** The accurate public reporting burdens for this ICR are reflected in the 2<sup>nd</sup>. FR. SSA inadvertently cited the pre Signature Proxy burdens in the 1<sup>st</sup>. FR.

- The requester will be given adequate warnings that the Internet is an open system and there is no absolute guarantee that others will not intercept and decrypt the personal information they have entered. They will be advised of alternative methods of requesting personal information, i.e., personal visit to a field office or a call to the 800 number to speak with a representative.
  - Only upon verification of identity will the requester be allowed access to additional screens, which allow requests and changes to personal information from SSA records.
11. The information collection does not contain any questions of a sensitive nature.
12. ISBA

Based on our experience with ISBA, we estimate that approximately 7% of those individuals who file for RIB or spouse’s benefits will opt to use the ISBA process each year.

Since the expansion of ISBA in January 2002 to include DIB, approximately 3% of those individuals who filed for DIB have opted to use the ISBA process. While we anticipate that the percentage will increase over time, data reported by the U.S. Department of Education, National Institute on Disability and Rehabilitation Research indicate a smaller percentage of people with disabilities access the Internet. Therefore, we are anticipating no more than 3% of those individuals who file for DIB will opt to use the ISBA process.

The total number of respondents for ISBA is anticipated to be 169,000. All of these respondents fall into the Individuals/Households category.

We have determined that there is an average response time of 20.4 minutes per ISBA responder. Thus the total burden for ISBA is 57,460 hours.

<u>Form Type</u>	<u>Number of Respondents</u>	<u>Estimated Completion time</u>	<u>Burden Hours</u>
<u>ISBA</u>	<u>169,000</u>	<u>20.4 minutes</u>	<u>57,460</u>
<u>Totals:</u>	<u>169,000</u>		<u>57,460</u>

While ISBA consists of a collection of 21 screens, the process has been designed to minimize the number of screens a respondent actually sees. For example, if the individual indicates that he/she was never married, he/she will not see the screens that capture detailed information about marriages. Each applicant will review

and/or complete a minimum of 6 screens (including the Home page and the page containing the Privacy Act and Paperwork Reduction Act notices). Based on our experience with the ISBA process, we estimate that applicants will complete 8 - 12 screens on average.

Paper Application Forms / MCS Application Interviews

SSA-1

Collection Method	Number of Respondents	Estimated Completion time	Burden Hours
MCS	708,435	10.5 minutes	123,976
MCS/Signature Proxy	708,436	9.5 minutes	112,169
Paper	43,821	10.5 minutes	7,669
<b>Totals:</b>	<b>1,460,692</b>		<b>243,814</b>

SSA-2

Collection Method	Number of Respondents	Estimated Completion time	Burden Hours
MCS	332,500	15 minutes	83,125
MCS/Signature Proxy	332,500	14 minutes	77,583
Paper	35,000	15 minutes	8,750
<b>Totals:</b>	<b>700,000</b>		<b>169,458</b>

SSA-16

Collection Method	Number of Respondents	Estimated Completion time	Burden Hours
MCS	734,133	20 minutes	244,711
MCS/Signature Proxy	734,134	19 minutes	232,476
Paper	45,410	20 minutes	15,137
<b>Totals:</b>	<b>1,513,677</b>		<b>492,324</b>

The total estimated number of respondents to all application collections formats is 3,843,369 with a cumulative total of 963,056 burden hours. The total burden is reflected as burden hours. No separate cost burden has been calculated.

13. There is no known cost burden to the respondents.

14. The annual cost to the Federal Government for ISBA is unknown as it is still under development.
15. There is no change in the public reporting burden.
16. The results of the information collection will not be published.
17. For the ISBA collection we are not requesting a waiver of the requirement to display the expiration date of the OMB approval on the ISBA screen.

In regards to the paper application forms, OMB has granted SSA an exemption from the requirement that the expiration date for OMB approval be printed on its program forms. SSA produces millions of public-use forms, many of which have a life cycle longer than that of an OMB approval. SSA does not periodically revise and reprint its public-use forms (e.g., on an annual basis). This exemption was granted so that otherwise useable editions of forms would not be taken out of circulation because the expiration date had been reached. In addition, Government waste has been avoided because stocks of forms will not have to be destroyed and reprinted.

18. 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. Collection of Information Employing Statistical Methodologies**

The application does not employ statistical methodologies.