From: Davidson, Liz [mailto:Liz.Davidson@ssa.gov]
Sent: Tuesday, December 11, 2007 1:37 PM
To: Matsuoka, Karen Y.
Cc: Lebowitz, Naomi
Subject: FW: national 800 number ICR

Karen,

Below, in blue, is SSA's answers to your questions. Thanks.

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- Why is this a new OMB # rather than an add-on to 0960-0618 (the internet version)?

  As per our statement in the Addendum to the Supporting Statement, we were unable to add the new telephone claims status request to 0960-0618 at the time that we submitted this clearance package as 0960-0618 was still under review at OMB. Since, at the time, we needed to receive clearance for this new automated telephone process by October (we have since revised that schedule due to other considerations, including a submittal to OMB in late September), we were unable to wait for OMB to finish the review of 0960-0618 before we began working on this clearance package. Now that OMB has reapproved 0960-0618, we will be able to combine the new telephone claims status under 0960-0618 as soon as we receive approval for the new process.

- The "business process description" says that confirmation numbers are given at field offices to claimants who express interest in using the internet claims status option, though this phone option would be of most use to those claimants who don't have access to the internet. Presumably, these claimants will not have asked for the confirmation number at the field office because they did not intend to use the internet to check their claims status. How will SSA notify them that this phone option is available and then supply them with the confirmation number?

  Currently when claimants file for Title II benefits at the Field Offices (or via the Internet), one of the questions they are asked is if they want to check the status of their claim using the Internet. If the claimant answers "yes" to this question, a confirmation number is processed and provided to the claimant. Once the telephone application is implemented, we will revise the question to include the fact that claimants will also be able to obtain claims status via telephone as long as they have a confirmation number.

- Once this ICR is approved, will field offices be instructed to provide this confirmation number to all claimants, whether or not they express interest in using the internet to check their claims status?

  As explained above, the confirmation number is only provided to Title II claimants who answer the specific question (i.e., Do you want to check the status of your claim using the Internet?) in the affirmative.

- OMB recently approved an automated phone system whereby SSI benes can report their monthly income data. One of the problems encountered in that system was the ability of the system to recognize uncommon names, and one of the suggestions OMB offered was to issue a PIN number at the field office (similar to the confirmation code SSA is proposing to use for the national 800 number) that the bene can use to authenticate their identities. SSA argued against this suggestion at the time. However, this ICR suggests that such a system would work. Does SSA intend to offer this authentication option for the other phone system for SSI benes?

The new National 800 Number Claims Status system does not propose a pin/password authentication methodology. The proposed methodology is knowledge-based authentication (KBA) and refers to a Title II telephone application. Though the data elements differ from those in the referenced ICR, we currently use KBA to authenticate individuals who call the SSI Monthly Wage Reporting telephone system. The Office of Quality Performance evaluated the usage of two-step pin/password authentication after the first SSIMWR pilot and found that SSI callers only had an approximate 50% authentication success rate. Moreover, those individuals who were able to authenticate required significant assistance from SSA personnel. Through our experience, we found that the 50% failure rate was caused by the complexity of the process for obtaining a password through the phone system (see the Password Registration Instructions attached).

Introducing the use of a confirmation code or a reusable entry number in lieu of the pin/password was considered but deemed to be an insecure system. Currently ISBA (and the new National 800 Claims Status system which utilizes the same aspects as ISBA) does not have an authentication process. ISBA asks for user information for identification purposes only, but not as authentication. Also, the confirmation codes which ISBA issues to users only allows a user to re-enter ISBA once to compete an unfinished application or check status once the application is completed. After that one-time use, the confirmation code is no longer usable and a new one must be issued.

According to the SSA authentication staff, issuing a reusable reentry number similar to a password and using this process would be similar to a 1-step PIN/password process. SSA does not use a 1-step PIN/password process in level 2 applications for security purposes; therefore we have only a 2-step process (as explained above). The privacy policy staff recommended against using 1 –step process for the SSI Wage Reporting in order to maintain security on the information provided by the users. The 2 -step process is the current PIN/password process that only 50% of participants in the first pilot were able to navigate through the telephone system.

At this time, SSA does not have plans to offer a pin/password authentication option for the SSI Monthly Wage Reporting application.