

Supporting Statement for Social Security Benefits Application:

Form SSA-1: Application for Retirement Insurance Benefits
Form SSA-2: Application for Wife's or Husband's Insurance Benefits
Form SSA-16: Application for Disability Insurance Benefits

MCS Screens

Internet Social Security Benefits Application (ISBA)

20 CFR 404.310-.311, .315-.322, .330-.333, .601-.603, and .1501-.1512

OMB No. 0960-0618

A. Justification

1. The Social Security Administration (SSA) provides Retirement, Survivors', and Disability benefits to members of the public who meet the required eligibility criteria and who file the correct application (as per Sections 202(b)-(c) and 223 (a) of the *Social Security Act* and Sections 20 CFR 404.310-.311, .315-.322, .330-.333, .601-.603, and 1501-.1512 of the *Code of Federal Regulations*). The public can apply for the appropriate benefit type using one of three modalities: 1) a paper application (form SSA-1, SSA-2, or SSA-16); 2) a field office interview, during which SSA employees enter applicant data directly into the Modernized Claims System (MCS); or 3) the Internet Social Security Benefits Application (ISBA), an online system that allows members of the public to apply electronically. Third-party representatives of applicants can use any of these modalities to apply for the applicants they represent.
2. This information collection, 0960-0618, includes all three benefits application modalities. In this ICR, we are making two changes to the collection: 1) we are giving third parties the ability to complete applications in ISBA and 2) we are implementing design changes that will make the application easier and less time-consuming to complete. The respondents are applicants for Retirement, Disability, or Spouse's Insurance Benefits or their third-party representatives.

SSA will use the information gathered by the multiple information collection tools in this ICR to determine if applicants are eligible for specific Social Security benefits and the amount of the benefits. Following is a list and description of these information collection

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tools:

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Paper Application Forms:

SSA-1 – Application for Retirement Insurance Benefits

SSA-2 – Application for Wife’s or Husband’s Insurance Benefits

SSA-16 – Application for Disability Insurance Benefits

In-person interview/MCS Screens:

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 the applicant’s initial responses.

MCS also propagates identity and similar information to other screens in the application. In contrast to the paper application, the in-person interview/MCS process offers the following advantages: 1) it improves accuracy in recording responses, 2) it reduces the overall interview time, and 3) it reduces the number of times we have to re-contact applicants to clarify responses.

Internet Social Security Benefits Application (ISBA):

ISBA is an online platform that applicants for all types of Social Security benefits can use. Depending on their initial answers, applicants are presented with different screens, ensuring they only respond to relevant questions. After completing the online application, applicants or their third-party representatives can submit it electronically to SSA, avoiding the need to visit an SSA office. ISBA is not only more convenient for beneficiaries, but also reduces their application completion time. **Since** it eliminates the need for an office visit, it also saves time and resources for SSA.

There are two ways to complete and submit ISBA. **First-party ISBA respondents** are beneficiaries who complete and submit the entire application online on their own behalf. They may have to submit supplementary supporting documents (ex: medical evidence for disability benefits applications), but they do not need to complete anything else to finalize their application. **Third-party ISBA respondents** are representatives of beneficiaries who complete ISBA on their behalf. Once these third parties submit the online ISBA application, SSA will send summary information and confirmation notices (included in our online ICR) to the first parties, or beneficiaries, whom they represent. The beneficiaries must sign the notice confirming the information and send it to SSA. Once SSA receives the notice (and whatever additional supplementary information is necessary), it can process the application.

3. Electronic versions of this information collection (specifically, MCS and ISBA) are available

under the Agency's Government Paperwork Elimination Act plan. Approximately 98% of respondents use electronic methods to submit their applications.

4. The nature of the information we are collecting and the manner in which we are collecting it preclude duplication. SSA does not have use any other collection instrument to gather the data we are collecting here.
5. This collection does not significantly impact small businesses or other small entities.
6. If SSA did not have this information collection, the public would have no way to apply for Social Security benefits, which would be a direct violation of the provisions established in the Social Security Act. Because we only collect the information once, we cannot collect it less frequently.

There are no technical or legal obstacles that prevent burden reduction.

7. There are no special circumstances that would cause SSA to conduct this information collection in a manner inconsistent with 5 CFR 1320.5.
8. SSA published the 60-day Advance Federal Register Notice on March 21, 2008, at 73 FR 15252, and we did not receive any public comments in response to this Notice. We published the 30-day Federal Register Notice on May 22, 2008, at 73 FR 29833. We will forward any public comments we receive in response to this Notice to OMB.

We did not consult with outside members of the public.

9. SSA provides no payments or gifts to the respondents (except for actual benefits payments, if applicants qualify for them).
10. The information we are requesting 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.

Additionally, SSA protects the personal information it receives by adhering to our Internet Privacy Policy, which stipulates that:

- The public does not need to give us personal information to visit our site;
- We collect personally identifiable information (name, SSN, DOB or

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E-mail) only if we know beneficiaries or their representatives provided it;

- We only use personal identifying information in conjunction with services beneficiaries requested at the time they submitted it to us;
- We sometimes perform statistical analyses of user behavior in order to assess customer interest in the various areas of our site. We will disclose this information to third parties only in aggregate, never specific form;
- We never give, sell, or transfer any personal information to a third party.

We also take the following measures to ensure the confidentiality of applicants' personal information:

- We encrypt all electronic requests using the Secure Socket Layer (SSL) security protocol. SSL encryption prevents a third party from reading the transmitted data even if the data are intercepted. This protocol is an industry standard used by banks such as Wells Fargo and Bank of America for Internet banking;
- We give applicants 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 the applicants submitted. Applicants 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;
- Requesters will only be allowed access to additional screens used for making changes to personal information or requests to the Agency once we verify their identity.

11. The information collection does not contain any questions of a sensitive nature.

12. Below we provide the annual burden estimates for the multiple components of this information collection. NOTE: Please note that the overall total burden reported here is 20 hours less than the figure reported in the Federal Register Notice. This slight discrepancy was caused by an accidental transposition of numbers for one information collection tool (SSA-1 MCS burden hours) in the FRN.

Paper Forms/Accompanying MCS Screens Burden Information:

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Form SSA-1:

Collection Method	Number of Respondents	Frequency of Response	Average Burden Per Response (minutes)	Total Burden (hours)
MCS	172,200	1	11 minutes	31,570
MCS/Signature Proxy	1,549,800	1	10 minutes	258,300
Paper	21,000	1	11 minutes	3,850
Totals:	1,743,000	-	-	293,720

Form SSA-2:

Collection Method	Number of Respondents	Frequency of Response	Average Burden Per Response (minutes)	Total Burden (hours)
MCS	36,860	1	15 minutes	9,215
MCS/Signature Proxy	331,740	1	14 minutes	77,406
Paper	3,800	1	15 minutes	950
Totals:	372,400	-	-	87,571

Form SSA-16:

Collection Method	Number of Respondents	Frequency of Response	Average Burden Per Response (minutes)	Total Burden (hours)
MCS	218,657	1	20 minutes	72,886
MCS/Signature Proxy	1,967,913	1	19 minutes	623,172
Paper	24,161	1	20 minutes	8,054
Totals:	2,210,732	-	-	704,112

ISBA Burden Information:

Form Type	Number of Respondents	Frequency of Response	Average Burden Per Response (minutes)	Total Burden (hours)
ISBA 3 rd Party	28,118	1	15 minutes	7,030
ISBA Applicant after 3 rd Party Completion	28,118	1	5 minutes	2,343

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First Party ISBA	541,851	1	15 minutes	135,463
Totals	598,087	-	-	144,836

The total burden for this collection is 1,230,239 hours, which is reflected as burden hours. We have not calculated a separate cost burden.

13. There is no known cost burden to the respondents.
14. The cost to the Federal Government for this collection is \$3,372,000. This figure represents the cost for printing paper forms, salaries for the SSA representatives who conduct field office interviews with benefits applications, and the cost of making changes to and maintaining ISBA.
15. The overall public reporting burden for this collection has increased slightly from 963,056 to 1,230,239 hours. This increase represents an added number of respondents, since third party representatives can now use ISBA for their clients. However, the actual completion time is reduced due to our redesigning and streamlining of ISBA.
16. We will not publish the results of the information collection.
17. For the **paper forms** in this collection, OMB granted SSA an exemption from the requirement that the expiration date for OMB approval be printed on the 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. We are not requesting an exemption from publishing the expiration date in **ISBA**.
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

This information collection does not use statistical methods.