

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 Claim (iClaim) Application Screens

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) iClaim, 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.

In this Information Collection Request (ICR), SSA is adding new functionality to the iClaim system. Specifically, we are allowing the public to submit a Medicare-only iClaim application. An explanation of Medicare-only iClaim follows.

For qualifying beneficiaries, an application for Title II cash payments is also an application for Title XVIII Hospital Insurance (HI) (as per *Section 226* of the *Social Security Act*), and by extension automatic enrollment in Supplemental Medical Insurance (SMI) as well (*Sections 1831* and *1836* of the *Act*). Individuals can choose to restrict their applications to HI/SMI, i.e. Medicare, but to defer cash benefits until a later date. This includes people who meet the age requirements for HI/SMI/Medicare benefits but continue to work, and so they want to enroll in Medicare but defer Title II retirement benefits. Accordingly, SSA refers to

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such situations as “Medicare-only” applications.

Currently, SSA allows the public to file such an application using the paper forms or MCS screens in this collection. In this ICR, we are adding a new path to iClaim that will enable beneficiaries to file a Medicare-only application electronically.

2. This information collection, 0960-0618, includes all three benefits application modalities for retirement, spouses, and disability applications. In this ICR, we are making one change to the collection: we are giving people the option to file Medicare-only claims via iClaim.

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 tools:

Paper Application Forms:

SSA-1 - Application for Retirement Insurance Benefits. SSA uses form SSA-1 to determine an individual’s entitlement to retirement insurance benefits. When an individual files for Medicare-only with a paper application, we rename it the “Application for Hospital Insurance” with pen-and-ink changes, and collect only the information needed for HI.

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 Claim (iClaim) Application:

iClaim is an online platform applicants can use to apply for several types of Social Security benefits. 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. iClaim is more convenient for users and reduces their application completion time by eliminating the need for an office visit. This also saves time and resources for SSA.

There are two ways to complete and submit iClaim. **First-party iClaim 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 iClaim respondents** are representatives of beneficiaries who complete iClaim on their behalf. Once these third parties submit the online iClaim 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 iClaim) are available under the agency's Government Paperwork Elimination Act plan. Approximately 94% 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 use any other collection instrument to gather the data we are collecting here.
5. This collection does not significantly affect 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 to burden reduction.

7. There are no special circumstances that would cause SSA to conduct this information in a manner inconsistent with 5 CFR 1320.5.

8. SSA published the 60-day advance Federal Register Notice on April 24, 2009, at 74 FR 18782, and we received no public comments. We published the 30-day Federal Register Notice on INSERT at XXXXX. If we receive any public comments in response to the 30-day Notice, we will forward them 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. SSA protects and holds confidential the information we are requesting 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 and holds confidential the 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 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 the information 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;

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- 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. We advise applicants about alternative methods of requesting personal information, i.e., personal visit to a field office or a call to the 800 number;
- We will only allow requestors access to additional screens used for making changes to personal information or requests to SSA once we verify requestor identity.

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

12. Below we provide annual burden estimates for the multiple components of this information collection.

Paper Forms/Accompanying MCS Screens/Burden Information:

Form SSA-1:

Collection method	Number of respondents	Frequency of response	Average burden per response (min)	Estimated annual burden (hours)
MCS	172,200	1	11	31,570
MCS/Signature Proxy	1,250,800	1	10	208,467
Paper	20,000	1	11	3,667
Medicare-only MCS	299,000	1	7	34,883
Medicare-only Paper	1,000	1	7	117
Totals	1,743,000	-	-	278,704

Form SSA-2:

Collection method	Number of respondents	Frequency of response	Average burden per response (min)	Estimated annual burden (hours)
MCS	36,860	1	15	9,215

MCS/Signature Proxy	331,740	1	14	77,406
Paper	3,800	1	15	950
Totals	372,400	-	-	87,571

Form SSA-16:

Collection method	Number of respondents	Frequency of response	Average burden per response (min)	Estimated annual burden (hours)
MCS	218,657	1	20	72,886
MCS/Signature Proxy	1,967,913	1	19	623,172
Paper	24,161	1	20	8,054
Totals	2,210,731	-	-	704,112

iClaim Burden Information:

Collection method	Number of respondents	Frequency of response	Average burden per response (min)	Estimated annual burden (hours)
iClaim 3 rd Party	28,118	1	15	7,030
iClaim Applicant after 3 rd Party Completion	28,118	1	5	2,343
First Party iClaim	541,851	1	15	135,463
Medicare-only iClaim (new to this ICR)	200,000	1	10	33,333
Totals	798,087	-	-	178,169

The aggregate public reporting burden for this ICR is **1,248,556** hours, which we report as burden hours. We did not calculate a separate cost burden.

NOTE: Please note the total burden figure reported here is slightly different than the figure reported in the Federal Register Notices (published on April 24, 2009, at 74 FR 18782 and INSERT WHEN PUBLISHES).

13. There is no known cost burden to the respondents.
14. The cost to the Federal Government for this collection is \$6,425,839. 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 the iClaim system.

15. The overall public reporting burden for this collection has increased from 1,230,239 to 1,248,556 hours (an 18,317-hour increase). This minimal increase represents the addition of the more time-consuming Medicare-only iClaim responses (which, while more convenient than an MCS field-office interview, technically take longer to complete).
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 iClaim.
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.