Justification for the Nonsubstantive Change to
Request for Internet Services & 800# Automated Telephone Services
Knowledge-Based Authentication (RISA)
20 CFR 401.45
OMB No. 0960-0596

Justification for the Non-Substantive Changes

SSA will revise the Knowledge-Based Authentication due to recommendations that came out of usability testing for the Spanish version of the Retirement Estimator. The revisions described below will become effective in November 2010, when we release the Spanish language version of the Retirement Estimator application.

The purpose of the Spanish Retirement Estimator (S-RE) project is to allow access to the Social Security Administration's (SSA) online Retirement Estimator (RE) to people who prefer to do business with SSA in Spanish. This is in keeping with the August 11, 2000 Executive Order 13166, "Improving Access to Services for Persons with Limited English Proficiency." The S-RE initiative is a critical first step in providing eServices in languages other than English to the broader segment of the population with Limited English Proficiency (LEP). Hispanics comprise 14% of the U.S. population. According to the U.S. Census Bureau, the Hispanic population is projected to nearly triple, from 46.7 million to 132.8 million, during the 2008-2050 period. The Hispanic online population will continue to increase to 29.4 million by 2012. The Management Information data shows a significant number of claimants doing business on the Internet who indicate their preferred language is Spanish.

The RE uses the Access Control Utility (ACU) for authentication. ACU for RE uses the Knowledge Based Authentication (KBA) Tier 4 method of authenticating a user. The system invokes the following three ACU KBA functionality screens: *Acknowledgment for Online Services*, *Information We Need*, and *Verify Your Information*. KBA authentication requires the user to provide these correct basic personal information in order to gain access to the RE application:
- SSN
- Name (First, Middle Initial, Last, Suffix)
- Mother's Maiden Name - In the event a user fails to match on Mother's Maiden Name (MMN), the system uses an Intelligent Search Tool (IST) "Fuzzy logic" in addition to our current protocol. The IST invokes a name comparison routine to determine the likelihood that two entities (the MMN input vs. name on NUMIDENT) are the same. This routine produces results containing scores representative of different interpretations of the data. We use a tolerance score of 60 in the comparison routine to determine if we can validate a reported name against the NUMIDENT. If the name matches the NUMIDENT within the acceptable tolerance, the user will pass MMN authentication.
- Date of Birth
- Place of Birth

After successful authentication, users can obtain online retirement benefit estimates based on the users' SSA maintained earnings records.

We anticipate the following number of respondents will access the Spanish version of the Retirement Estimator in the first year of implementation: 332,400

This will increase the total burden hours by 8,310 as shown in the chart below:

Forms	Number of Respondents	Frequency of Response	Average Burden Per Response	Burden Hours
Internet Requestors	3,539,903	1	1 ½ Minutes	88,498
Telephone Requestors	24,321,867	1	1 ½ Minutes	608,047
Intranet Requestors	1,500,000	1	1 ½ Minutes	30,000
Totals:	**29,361,770**			**734,045**

Summary of the Changes

- **Change 1:**   We are making the following changes to the Access Control Utility (ACU) *Acknowledgement for Online Services* page.

    o   Changed screen title from "Acknowledgement for Online Services" to "Terms for Use of Online Services," and we simplified the language on the page

        ▪   Usability testing with the Spanish users revealed that this page contains language that is difficult to understand. Therefore, we lowered the educational level of our ACU Acknowledgement page. There were issues with the grade/educational level of the screen language, as explained in a comment from the Hispanic Community Leaders in April and from members of the Hispanic Affairs Advisory Council, particularly on the "Acknowledgement of online services" page. We made changes to language to address the comment.

        ▪   We simplified the language on this page as much as possible with the approval of the Office of Communications and the Office of General Counsel.

    o   Added the OMB Clearance language with a link to the Paperwork Reduction Act, spelled out the month in the OMB expiration date, and added a link to the Privacy Act Statement along with a mandatory checkbox indicating that user has read the Privacy Act Statement

        ▪   Office of General Counsel instructed us to put the OMB Clearance language on the screen with a link to the Paperwork Reduction Act

        ▪   We spelled out the month in the OMB expiration date to avoid confusion with the Spanish date format.

- Office of Privacy and Disclosure instructed us to make the link to the Privacy Act Statement highly visible and to include a mandatory checkbox to indicate the user read the Privacy Act Statement. (this format is consistent with iClaim)

  o Simplified the language in the attestation statement with General Law approval

  - General Law approved the simplified language in the attestation statement.

  o Changed the look of the screen to fit the User Experience Framework (UEF) architecture (field titles moved out of the left panel)

  - Office of Systems Electronic Services is required to develop screens using the UEF architecture; therefore, we complied with the requirement.

- **Change 2:** We spelled out the month of the OMB expiration date on the *Paperwork Reduction Act Statement* page.

  o We are making this change to avoid confusion with the Spanish date format, and to maintain consistency in our Internet applications.

- **Change 3:** We added a new *Privacy Act Statement* page with new language.

  o Office of Privacy and Disclosure pointed out that this language was missing from the ACU screens.

- **Change 4:** We are making the following changes to the Access Control Utility (ACU) *Information We Need* page.

  o We grouped all name fields together – Full Name, Other Last Name, and Mother's Maiden Name, and we revised the entire page to fit into the UEF architecture (grouping similar fields, removing extraneous text, consistent look and feel).

  - Office of Systems Electronic Services is required to develop screens using the UEF architecture; therefore, we complied with the requirement as explained above.

  o We revised the instructional text for most of the entry fields for clarification.

  - Spanish usability testing participants had problems understanding the existing instructional text, or lack of it. They asked for simpler, clarifying instructional text for Name and SSN fields.

  o SSN Field - We changed the functionality of the SSN field to accept entries with or without dashes. We revised the instructional text to conform to this functionality change.

▪ Usability test results showed users often incorrectly entered SSN with dashes, which the existing field would not accept.

o Date of Birth Field - Day and Year are no longer drop-down lists. We will allow the user to key in his/her day and year of birth.

▪ Usability test results showed that users did not like to have to select birth day and year from a list – too much scrolling.

o Place of Birth Field – We have added radio buttons for the user to select U.S. or Foreign Country as place of birth. We then display the appropriate Global Reference Table, depending on the user's selection.

▪ Spanish usability test results recommended a cleaner design for this field with use of the Global Reference Table for foreign countries, as well as U.S. States and Territories.

- **Change 5:**   We are making the following changes to the Access Control Utility (ACU) *Verify Your Information* page.

o We revised the entire page to fit into the User Experience Framework (UEF) architecture (grouping similar fields, removing extraneous text, consistent look and feel).

▪ Office of Systems Electronic Services is required to develop screens using the User Experience Framework (UEF) architecture.

o We are moving the instructional text to the top of the page, and we added an "About You" title.

▪ Spanish usability test results indicated that users were having trouble navigating this page.

o We changed the name of the "Change Your Information" button to "Edit" and moved it to the top of the page where it is more visible.

▪ "Edit" is easily understood and consistent with other pages.

o We moved the Mother's Maiden Name field up on the page so we could group it with the other name fields.

▪ UEF calls for grouping similar fields.

o We changed the name of the "Confirm" button to "Continue."

- We made this change based on a recommendation from Spanish Usability testing.

   o **NOTE:**   We will make the same changes to the ACU Tier 1 and Tier 2 *Information We Need* and *Verify Your Information* pages and to the applicable fields on those pages.

- **Change 6:**   We are making the following change to the Access Control Utility (ACU) Error Message 016 ***Check The Social Security Number You Entered*** page. This is a change in screen pathing. Currently, when the user is entering information on the ***Information We Need*** page, if we are unable to match SSN, the user gets Error Message 016 that states that we cannot accept the SSN entered. When the users leave this screen, the system kicks them out of the ACU and takes them back to the ***Online Services*** page. The users then must start from the beginning. We are adding a "Previous" button to this error message screen. When the users select it, the system will take them back to the ***Information We Need*** page, so they can try again to enter the SSN correctly.

   o This change is due to a recommendation that came out of usability testing for the Spanish version of the Retirement Estimator to provide a process flow that makes more sense to the user.