

**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
Internet Claim (iClaim) Application Screens
20 CFR 404.310-404.311, 404.315-404.322, 404.330-404.333, 404.601-404.603, and 404.1501-
404.1512**

OMB No. 0960-0618

A. Justification

1. Introduction/Authoring Laws and Regulations

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 404.310-404.311, 404.315-404.322, 404.330-404.333, 404.601-404.603, and 404.1501-404.1512 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 allowing 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. Description of Collection

In this Information Collection Request (ICR), SSA is adding new functionalities to the iClaim system and implementing the President’s SAVE award initiative. This ICR also includes all three benefits application modalities for retirement, spouses, and disability applications. In this ICR, we are adding the following functions to the iClaim system:

- An error message with a link to the iAppointment application
- The iAppointment application
- Collection paths to obtain foreign residence and mailing address
- Medicaid and Group Health Plan Questions, currently available for Medicare-Only iClaim
- A new functionality to allow applicants to cancel appointments

We are also revising the following paper forms to reflect the new language in MCS, policy updates and Privacy Act and Paperwork Reduction Act statements changes:

- SSA-1-BK (Application for Retirement Insurance Benefits)
- SSA-2-BK (Application for Wife’s or Husband’s Insurance Benefits)

- SSA-16-BK (Application for Disability Insurance Benefits)

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. The following is a list and description of these information collection instruments:

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 hospital insurance.

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

SSA-16 – Application for Disability Insurance Benefits

In-person interview/MCS Screens:

MCS mirrors the hardcopy application formats using an electronic collection method. 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 the applicant files, 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, the program presents applicants with different screens, ensuring they only respond to relevant questions. After completing the online application, claimants 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 claimants who complete iClaim on behalf of the claimants. Once these third parties submit the online iClaim application, SSA will send application summaries and confirmation notices (included in our online ICR) to the first parties, or claimants, whom they represent. The claimants must sign the application summary confirming the information and submit it to SSA. Once SSA receives the application summary (and whatever additional supplementary information is necessary,) we can process the application.

Internet Appointment (iAppointment) Application:

In April 2009, President Obama announced the SAVE award initiative inviting federal employees nationwide to submit suggestions to the White House on ways the federal agencies can save money. An SSA employee was one of the finalists for the President’s SAVE Award.

In December 2009, the White House charged SSA to implement a more comprehensive version of the SSA finalist’s suggestion focusing on online service delivery. The following is an excerpt from that charge:

“I am asking the agency to develop an online process that will guide the user through a series of questions, soliciting the necessary information only once, and directing the person to the most appropriate service delivery method for his or her situation. That could be a telephone call or an online response. However, if the agency determines that your inquiry requires an appointment with a field office, you will be able to schedule that appointment online. I have asked the Social Security Administration to provide a detailed plan for this citizen-centric online process within 90 days and to deliver on this promise by the end of 2010.”

Additionally, OMB issued a memorandum on December 21, 2009, requiring all agencies to submit a written plan for implementing two initiatives that expand citizens’ access to services through the Internet. The online appointment calendar is the first of these two required initiatives. SSA developed the iAppointment application to accommodate this OMB directive.

3. Use of Information Technology to Collect the Information

SSA offers electronic versions of this information collection (specifically, MCS and iClaim) under the agency’s Government Paperwork Elimination Act plan. Approximately 94% of respondents submit their applications via electronic methods.

4. Why We Cannot Use Duplicate Information

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. Minimizing Burden on Small Respondents

This collection does not significantly affect small businesses or other small entities.

6. Consequence of Not Collecting Information or Collecting it Less Frequently

If SSA did not collect this information, 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. Special Circumstances

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

8. Solicitation of Public Comment and Other Consultations with the Public

The 60-day advance Federal Register Notice published on March 4, 2010, at 75 FR 9992, and SSA received no public comments. The second Notice published on August 18, 2010, at 75 FR 51153. If we receive any comments in response to the 30-day Notice, we will forward them to OMB. SSA did not consult members of the public in the development of this form.

9. Payment or Gifts to Respondents

SSA provides no payments or gifts to the respondents (except for actual benefits payments, if applicants qualify for them).

10. Assurances of Confidentiality

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:

- 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 they intercept any data. 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 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. Justification for Sensitive Questions

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

12. Estimates of Public Reporting Burden

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 (minutes) | 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 (minutes) | 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 (minutes) | 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 (minutes) | 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 | 200,000 | 1 | 10 | 33,333 |
| Totals | 798,087 | | | 178,169 |

iAppointment Burden Information:

| Collection method | Number of respondents | Frequency of response | Average burden per response (minutes) | Estimated annual burden (hours) |
|-------------------|-----------------------|-----------------------|---------------------------------------|---------------------------------|
| iAppointment | 200,000 | 1 | 10 | 33,333 |
| Total | 200,000 | | | 33,333 |

The aggregate public reporting burden for this ICR is **1,281,889** hours, which we report as burden hours. We did not calculate a separate cost burden.

13. Annual Cost Burden to the Respondents (Other)

This collection does not impose a known cost burden on the respondents.

14. Annual Cost To Federal Government

The annual cost to the Federal Government is approximately \$7,735,300. This figure represents the cost for printing paper forms, salaries for the SSA representatives who conduct field office interviews with benefits applicants, the cost of making changes to and maintaining the iClaim system, and the approximately \$1,314,300, which we estimate as the cost for developing the Internet application for iAppointment.

15. Program Changes or Adjustments to the Information Collection Request

The increase in the public reporting burden is due to the addition of iAppointment. There are no changes or adjustments to the public reporting burden related to the new revisions to the iClaim screens or the paper Forms SSA-1, SSA-2 and SSA-16.

16. Plans for Publication Information Collection Results

SSA will not publish the results of the information collection

17. Displaying the OMB Approval Expiration Date

For the paper forms in this collection, OMB granted SSA an exemption from the requirement to print the OMB expiration date on its program forms. SSA produces millions of public-use forms with life cycles exceeding those of an OMB approval. Since SSA does not periodically revise and reprint its public-use forms (e.g., on an annual basis), OMB granted this exemption so SSA would not have to destroy stocks of otherwise useable forms with expired OMB approval dates, avoiding Government waste.

SSA is not requesting an exemption to the requirement to display the OMB approval expiration date for iClaim.

18. Exception to Certification Statement

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.