

**Justification for Non-Substantive Changes to  
Single Sign-On (SSO) & Integrated Registration Services (IRES)  
20 CFR 401.45  
OMB No. 0960-0626**

**Summary of Changes for Business Services Online (BSO) - for Employer Wage Reporting**

**Attachment 1: Revised screen package for Employer Suite of Services**

We are requesting BSO screen changes for the IRES Revisions to the Employer Suite of Services. The attached screen package contains both the new and old versions of each screen. The new versions of the screens show the language changes highlighted. The old versions of the screens contain strikeouts. Since there is no “one-to-one” replacement for the service selection, service confirmation, and view pending services screens, we included the old versions of those screens in a section of “superseded screens” at the end of the document. We annotated the page numbers in the new versions of the screens where the changes occur in the explanation below.

**Change 1:**

We are merging the task of “View Wage Reports without Name/SSN Errors” into “Report Wages to Social Security.” We are revising the service selection page and removing references to the “View Wage Reports without Name/SSN Errors” as a separate service (Page 5).

**Justification 1:**

This is not a separate service; rather, it falls under the service of reporting wages.

**Change 2:**

Before this release, if the system could not find an employer address in SSA records, or could not find wages for the user associated with the selected employer, we did not persist with the service choice. After we resolved the employer-related failures, we required the user to go back and select the service(s) again. The new release will persist with the selection. The services will remain pending until we resolve the failures.

- We will make the *Request Access to BSO Services Confirmation* page “conditional” depending on the scenario.
- We will make the *View Pending* page “conditional” depending on the scenario.
- We will incorporate the “Send fax to provide the information” message into the *Request Access to BSO Services Confirmation* and *View Pending* pages.

**Justification 2:**

This change will improve user experience.

**Change 3:**

We are addressing sponsors’ requests to clarify some of the wording on the IRES-BSO pages,

and to delete an inappropriate statement (“I agree that I am responsible for all actions taken with my User ID”) from the User Certification dialogue. To delete the User Certification language, we will require the following changes to the “scrolling” attestation text box on the following pages:

1. the *Log In to Online Services* page (pages 37 - 40 ) which appears for both the BSO and AR URLs because they share the same program;
2. the *Employer Information Attestation* page (pages 45 – 48);
3. the *User Registration Attestation* page (pages 41 – 44); and,
4. the *Create a Login Account* page (pages 49 – 52)

### **Justification 3:**

This change will provide clarity and improve user experience.

### **Number of Respondents**

We do not expect the number of respondents to change due to these maintenance changes.

## **Summary of Changes for Business Services Online - for Appointed Representative Suite of Services**

Attachment 2: Intranet IRES (CSA) Screen Package. We annotated the page numbers where the changes occur in the explanation below.

### **Change 1: Authentication Protocol for Appointed Representative Suite of Services**

SSA created an interim manual process to register appointed representatives for direct payment of fees and to enroll them for access to electronic folders.

### **Justification 1:**

SSA is conducting in-person identity proofing as an alternative to Internet-based authentication protocols. We invite representatives who we feel need to enroll, as well as those who request an invitation, to attend an in-person proofing event where they enroll for access to electronic folders. We send out invitation notices to representatives who have clients with claims pending at the Hearings level. The invitation notice includes a copy of Form SSA-1699, which we require from them for electronic folder access. SSA staff conducts in-person proofing and enrollment assistance at professional conferences and regional events. We also plan to conduct in-person proofing in Hearings Offices since representatives routinely appear before Administrative Law Judges when representing their claimants. In-person proofing and enrollment for electronic folder access at the Hearings office will mirror the current process in place for stand-alone events.

**Change 2:**

We are conducting in-person identity proofing in place of online and telephone authentication. For in-person ID proofing of appointed representatives, we have added 3 new screens, and links to access the screens directly from the homepage, to the Intranet IRES application, also known as the Customer Support Application (CSA). SSA representatives conducting the in-person interviews will use these screens and links to identity-proof users of the electronic folder application. The new screens are the *Record ID* (page 4), *Activation Code Print-Out* (page 6), and *View Activation Code for Electronic Folder* (page 9). The new links are “Record ID,” “Print Activation Code,” and “View Activation Code.”

**Justification 2:**

In-person identity proofing and enrollment assistance significantly reduces the time required for a representative to obtain an authentication credential and improves the success rate for completing electronic folder enrollment.

**Change 3:**

We are adding a requirement for the representative to present a valid state driver’s license or United States passport during the in-person identity proofing process. We developed a new CSA screen to capture information from these documents: the *Record ID* screen (page 4).

**Justification 3:**

We added this requirement to strengthen our authentication protocols and to meet OMB and NIST guidelines for Level 3 identity proofing. Access to the electronic folder requires Level 3 authentication.

**Change 4:**

Representatives registering to request that Social Security withhold their fee payments from the clients’ benefit payments (referred to as direct payment of fees) will not register through the Internet Registration (IRES) process. We currently collect the registration information for direct payment of fees using form SSA-1699, Registration for Appointed Representative Services and Direct Payment (OMB Control No. 0960-0732). The revised information collection request for the SSA-1699 (0960-0732) is currently pending approval from OMB.

**Justification 4:**

We changed the business process for registering representatives by removing the requirement for representatives to register using the IRES process. We notified OMB of the change through the emergency clearance of 0960-0732, approved on February 12, 2010.

### Number of Respondents

Due to the above revisions, we anticipate a reduction in the number of appointed representative respondents. We estimate that during the interim registration process 26,000 appointed representatives will register using the Customer Support Application (CSA) within the first year of implementation. The average time to enroll an appointed representative for access is 15 minutes for an annual reporting burden of 6,500 hours:

<b>Type of Respondent</b>	<b>Number of Respondents</b>	<b>Frequency of Response</b>	<b>Average Burden Per Response (minutes)</b>	<b>Total Annual Burden (hours)</b>
Appointed Representatives in-person enrollment via the CSA screens	26,000	1	15	6,500

This estimate represents a decrease in the number of respondents previously reported. We previously estimated the number of respondents using the internet process to be 200,000; however, since we removed the internet process as part of our revisions to the business process, no one will be registering using the internet process.

In addition, we previously estimated the number of respondents using the CSA process to be 88,000. This estimate will decrease for two reasons: 1) representatives registering for direct payment of fees will no longer use the IRES CSA registration process, and 2) only representatives who are enrolling for access to the electronic folder will use the IRES CSA screens. Due to these changes, we estimate the number of representatives eligible to enroll for access to the electronic folder will be no more than 26,000.

Implementing the in-person proofing model, eliminates the delay between the time appointed representatives expresses interest in enrolling for electronic folder access and the time they can access their clients' folders online.

### Attachments

Attachment B: AR IRES CSA screen flow – 07/12/2010

Attachment C: AR IRES Screen Flow – 07/01/10