Justification for Non-Substantive Changes to
Social Security Administration's Public Credentialing and Authentication Process
20 CFR 401.45, 20 CFR 402
OMB No. 0960-0789

Background

We have new and revised screens we are adding to the information collection for Social Security's registration, credentialing, and authentication process for the public. In the period since OMB approved the original screen package in September 2011, we conducted reviews and quality testing uncovering the need to correct and clarify certain screen language. To summarize, these changes are necessary to ensure the public can access the online process efficiently and securely. They include:

- new error messages for the Registration and Customer Support (RCS) Intranet version of the process;
- new error messages for the Internet version of the registration process;
- the implementation of new attestation Terms of Service that apply to all public-facing Internet applications; and
- revised language to add the Discover card to the Internet screens listing the credit cards we accept for financial verification.

We are submitting a table listing the screens and describing the changes along with the actual screens and the justification statement (see table below).

- **Change #1:** We added new error messages to the RCS Intranet telephone and in-person user search screens.

  Justification #1: These error messages address exception scenarios to:
  o tell the RCS user (or Social Security employee) that customers have not activated their online accounts and the activation codes have expired. The RCS user must issue the customers new activation codes. Previously, we had no way to identify and deal with incomplete account scenarios;

  o tell the RCS user the cell phone text message code entered on the screen is incorrect and to try again, or send a new text code to the customer's cell phone;

  o inform the RCS users when they attempt to access a restricted record (the record of an Individual of Extraordinary National Prominence – IENP) and must notify their manager.

- **Change #2:** We added new error messages to the Internet version of the registration process.

  Justification #2:
  o We added language to address both our banned and non-banned customers per the Protecting the Public and Our Personnel to Ensure Operational Effectiveness (RIN

0960-AH35), 42 CFR 422.901 – 422.907, published in the Federal Register on 9/2/11 at 76 FR 54700. If SSA bans a customer from visiting a Social Security field office in person, then we do not want our Internet error message language directing that customer to a field office for assistance. A banned customer may only call or write Social Security. Therefore, for non-banned customers we display language telling them they may call or visit a Social Security field office, while for banned customers we display language telling them they may call Social Security (and leaves out any mention of visiting a field office).

o   We added language to our error messages to tell the customers they can request a paper Social Security Statement by mail when we cannot create an account or when there is a lockout of suspension of the customer's account.

o   We revised our "Service not available" screens to correct the operating hours and the "Federal Holiday" information.

- **Change #3:** We changed the language on our Internet attestation Terms of Service (TOS) screen – the language the customers see when they sign in to their online accounts.

   Justification #3: We made this change because OIG expressed concern that some U.S. attorney's offices were refusing to take on SSA fraud cases perpetrated through the agency's web applications due to insufficient TOS language. We formed a special workgroup to come up with language addressing these concerns. Our eGovernance Steering Committee approved the final revised TOS language we are adding.

- **Change #4:** We added language to our Internet Extra Security screens.

   Justification #4: We made this change to add the Discover Card to the list of acceptable credit cards we can use to do a financial check when customers request to add extra security to their accounts.

We plan to implement these non-substantive changes upon OMB's approval. In addition, we are making these changes based on a directive from our Commissioner.

Screen Listing with Revisions and Explanations

Screen number/name	Page #	Revision	Justification
#1536	2	FO Telephone and N8NN versions of RCS: Pending Account – activation code expired	Add new error message to the RCS Intranet Telephone and In-Person User Search screen to tell the RCS user (or Social Security employee) that the customer has not activated his or her online account and now the activation code has expired. The RCS user must issue the customer a new activation code. Previously, we had no way to identify and deal with incomplete account creation scenarios.
#1537	3	FO Telephone RCS & N8NN RCS: Verify Text Message – Wrong code input	Add new error message to the RCS Intranet Telephone and In-Person User Search screen to tell the RCS user the cell phone text message code entered on the screen is incorrect and to try again or send a new text code to the customer's cell phone.
#1538	4	FO In-Person version of RCS: Pending Account – activation code expired	Add new error message to the RCS Intranet Telephone and In-Person User Search screen to tell the RCS user the cell phone text message code entered on the screen is incorrect and to try again or send a new text code to the customer's cell phone.
#1539	5	Spin code exclusion, failed out of wallet, insufficient out of wallet questions returned, EDS fraud alert for user not banned from field office	Add new error message to the Internet version of the registration process to address both our banned and non-banned customers per regulations at *42 CFR 422.901 – 422.907*, published in the Federal Register on 9/2/11 at 76 FR 54700. For non-banned customers, we display language telling them they can call or visit a Social Security field office.
#1540	5	Spin code exclusion, failed out of wallet, insufficient out of wallet questions returned, EDS fraud alert for user banned from field office	Add new error message to the Internet version of the registration process to address both our banned and non-banned customers per regulations at *42 CFR 422.901 – 422.907*. If SSA bans a customer from visiting a Social Security field office in person, then we do not want to direct that customer to a field office for assistance when we display error messages. A banned customer may only call or write Social Security. For banned customers, we display language telling them they may call Social Security.
#1541	6	Identity Failure Lockout for user who is not banned from field office	Add new error message to the Internet version of the registration process to address both our banned and non-banned customers per regulations *42 CFR 422.901 – 422.907*. For non-banned customers, we display language telling them they can call or visit a Social Security field office.

#1542	6	Identity Failure Lockout for user who is banned from field office	Add new error message to the Internet version of the registration process to address both our banned and non-banned customers per regulations *42 CFR 422.901 – 422.907*. For banned customers, we display language telling them they may call Social Security.
#1543	7	Exclusion - underage user who is not banned from field office	Add new error message to the Internet version of the registration process to address both our banned and non-banned customers per regulations, *42 CFR 422.901 – 422.907*. For non-banned customers, we display language telling them they can call or visit a Social Security field office.
#1544	7	Exclusion - underage user who is banned from field office	Add new error message to the Internet version of the registration process to address both our banned and non-banned customers per regulations *42 CFR 422.901 – 422.907*. For banned customers, we display language telling them they may call Social Security.
#1545	8	Identity Failure Lockout (2nd time within 7 days) for user who is not banned from field office	Add new error message to the Internet version of the registration process to address both our banned and non-banned customers per regulations *42 CFR 422.901 – 422.907*. For non-banned customers, we display language telling them they can call or visit a Social Security field office.
#1546	8	Identity Failure Lockout (2nd time within 7 days) for user who is banned from field office	Add new error message to the Internet version of the registration process to address both our banned and non-banned customers per regulations *42 CFR 422.901 – 422.907*. For banned customers, we display language telling them they may call Social Security.
#1549	9	Login - Terms of Service	We changed the language on our Internet attestation Terms of Service (TOS) screen. This is the language the customer sees when he or she signs in to his or her online account. OIG expressed concern that some US Attorneys' Offices were refusing to take on SSA fraud cases perpetrated through the agency's web applications due to insufficient TOS language.
#1592	10	Service is not available	We revised our "Service not available" screens to correct the operating hours and the "Federal Holiday" information.
#1593	11	OTSO service is not available	We revised our "Service not available" screens to correct the operating hours and the "Federal Holiday" information.
Discover Card	12	Add Extra Security #1	We added language to our Internet Extra Security screens. We made this change to add the Discover Card to the list of acceptable credit cards we can use to do a financial check when the customer requests to add extra security to his or her account.
Discover Card	13	Add Extra Security	We added language to our Internet Extra Security

		#2	screens. We made this change to add the Discover Card to the list of acceptable credit cards we can use to do a financial check when the customer requests to add extra security to his or her account.
IENP Search	14	Using User Name	Add new error message to the RCS Intranet Telephone and In-Person User Search screen to: • tell the RCS users they attempted to access a restricted record (the record of an Individual of Extraordinary National Prominence – IENP) and must notify his or her manager.
IENP Search	15	Using SSN	Add new error message to the RCS Intranet Telephone and In-Person User Search screen to: • tell the RCS users they attempted to access a restricted record (the record of an Individual of Extraordinary National Prominence – IENP) and must notify his or her manager.