

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

**Justification for Non-Substantive Changes to the Collection**

The Commissioner of Social Security (COSS) and SSA’s Office of General Counsel (OGC) requested revisions to the electronic access to My Social Security Terms of Service (TOS) pages to mitigate possible fraudulent access of the online service by third party users. The COSS and OGC requested these changes following reports of fraudulent access after we implemented SSA’s Public Credentialing and Authentication Process on 5/1/2012. To ensure we avoided fraudulent access, SSA updated the TOS screens on 6/9/12 prior to obtaining OMB approval. Therefore, we are requesting OMB approval now to correct SSA’s violation of the Paperwork Reduction Act.

In addition, on 6/23/12, we added Armed Forces Postal Address/Fleet Postal Address (APO/FPO) selections to the drop-down menu on three Internet and two intranet (RCS) screens. These are valid US postal addresses customers can select when registering. We added these addresses in response to numerous requests from service members who were unable to complete the registration process because the new authentication process did not specify the required selections.

SSA expects to make numerous revisions to the Public Credentialing and Authentication Process as we roll it out nationally and include more applications as part of this new authentication method. As we progress with this new process, we intend to inform OMB of all revisions to the screens via Change Request prior to making the changes. We apologize for our oversight in making the revisions to the TOS screens and adding the APO/FPO selections before we obtained OMB’s approval.

**Revisions to the Collection Instrument**

- **Change 1:** We are adding new language to the electronic access “Create an Account” TOS after the fourth bullet under the heading, “You must be able to verify some information about yourself and:”
  - **New Language:** You can create an account only to gain access to your own personal information. You cannot use this online service to access the records of a person:
    - With whom you have a business relationship;
    - For whom you are an appointed representative.

Unauthorized use of this service is a misrepresentation of your identity to the federal government and could subject you to criminal or civil penalties, or both.

- **Justification 1:** We are making this change to clarify who can create a My Social Security Account.
- **Change 2:** We are adding a question mark to the second header on the electronic access “Create an Account” TOS.
  - **Old Language:** What will we do with your information.
  - **New Language:** What will we do with your information?
- **Justification 2:** Adding a question mark to make the sentence grammatically correct.
- **Change 3:** We are changing the wording of the third and fourth header on the electronic access “Create an Account” TOS.
  - **Old Language:** What happens if you provide false information? What happens if you misuse this service?
  - **New Language:** What happens if you provide false information or misuse this service?
- **Justification 3:** We are consolidating headers.
- **Change 4:** We are changing language to the electronic access “Create an Account” TOS under the consolidated headers.
  - **Old Language:** You commit a federal crime if you give false or misleading statements to obtain information from our records or deceive us about your identity. We will stop you from using our online services if we find or suspect misuse.
  - **New Language:** You may be subject to criminal or civil penalties, or both, if you provide false or misleading statements to sign in or create an account or engage in unauthorized use of this service.
- **Justification 4:** We are making this change to clarify the consequences of fraudulent use of the service.

- **Change 5:** We are adding language to the My Social Security TOS, as a new first bullet item.
  - **New Language:** I understand that I may use this service only to access my personal information.
  
- **Justification 5:** We are making this change to clarify who can create a My Social Security Account.
  
- **Change 6:** We are changing language to the second bullet item on the My Social Security TOS.
  - **Old Language:** I consent to the monitoring of my use of this program to ensure its appropriate use.
  
  - **New Language:** I consent to the monitoring and recording of my use of this program to ensure its appropriate use.
  
- **Justification 6:** We are making this change to clarify that monitoring the customer's use of this service also includes keeping an electronic record of their activity.
  
- **Change 7:** We are changing language to the fourth bullet item on the My Social Security TOS.
  - **Old Language:** I understand that unauthorized use of, or access to, this computer program may subject me to criminal or civil penalties, or both.
  
  - **New Language:** I understand that unauthorized use of this service is a misrepresentation of my identity to the federal government and could subject me to criminal or civil penalties, or both.
  
- **Justification 7:** We are making this change to clarify the consequences of fraudulent use of the service.
  
- **Change 8:** We are adding a question mark to the second header on the "Add Extra Security" TOS.
  - **Old Language:** What will we do with your information.
  
  - **New Language:** What will we do with your information?

- **Justification 8:** Adding a question mark to make the sentence grammatically correct.
- **Change 9:** We are changing language of the third and fourth header on the “Add Extra Security” TOS.
  - **Old Language:** What happens if you provide false information? What happens if you misuse this service?
  - **New Language:** What happens if you provide false information or misuse this service?
- **Justification 9:** We are consolidating headers.
- **Change 10:** We are changing language to the “Add Extra Security” TOS under the consolidated headers.
  - **Old Language:** You commit a federal crime if you give false or misleading statements to obtain information from our records or deceive us about your identity. We will stop you from using our online services if we find or suspect misuse.
  - **New Language:** You may be subject to criminal or civil penalties, or both, if you provide false or misleading statements to sign in or create an account or engage in unauthorized use of this service.
- **Justification 10:** We are making this change to clarify the consequences of fraudulent use of the service.
- **Change 11:** We are adding new language to the TOS on the “Finish Setting Up your Account” screen, after the fourth bullet under the heading, “You must be able to verify some information about yourself and:”
  - **New Language:** You can create an account only to gain access to your own personal information. You cannot use this online service to access the records of a person:
    - With whom you have a business relationship;
    - For whom you are an appointed representative.
 Unauthorized use of this service is a misrepresentation of your identity to the federal government and could subject you to criminal or civil penalties, or both.
- **Justification11:** We are making this change to clarify who can create a My Social Security Account.

- **Change 12:** We are adding a question mark to the second header on the “Finish Setting Up your Account” screen TOS.
  - **Old Language:** What will we do with your information.
  - **New Language:** What will we do with your information?
- **Justification 12:** Adding a question mark to make the sentence grammatically correct.
- **Change 13:** We are changing the wording of the third and fourth header on the “Finish Setting Up your Account” screen TOS.
  - **Old Language:** What happens if you provide false information? What happens if you misuse this service?
  - **New Language:** What happens if you provide false information or misuse this service?
- **Justification 13:** We are consolidating headers.
- **Change 14:** We are changing language to the “Finish Setting Up your Account” screen TOS under the consolidated headers.
  - **Old Language:** You commit a federal crime if you give false or misleading statements to obtain information from our records or deceive us about your identity. We will stop you from using our online services if we find or suspect misuse.
  - **New Language:** You may be subject to criminal or civil penalties, or both, if you provide false or misleading statements to sign in or create an account or engage in unauthorized use of this service.
- **Justification 14:** We are making this change to clarify the consequences of fraudulent use of the service
- **Change 15:** We are changing the first header on the “Reset or Disable Extra Security” screen TOS to be consistent with TOS statement throughout the application.
  - **Old Language:** What we will do with your information.

- o **New Language:** What will we do with your information?
- **Justification 15:** Adding a question mark to make the sentence grammatically correct.
- **Change 16:** We are changing the wording of the second and third header on the “Reset or Disable Extra Security” screen TOS.
  - o **Old Language:** What happens if you provide false information? What happens if you misuse this service?
  - o **New Language:** What happens if you provide false information or misuse this service?
- **Justification 16:** We are consolidating headers.
- **Change 17:** We are changing language to the “Reset or Disable Extra Security” screen TOS under the consolidated headers.
  - o **Old Language:** You commit a federal crime if you give false or misleading statements to obtain information from our records or deceive us about your identity. We will stop you from using our online services if we find or suspect misuse.
  - o **New Language:** You may be subject to criminal or civil penalties, or both, if you provide false or misleading statements to sign in or create an account or engage in unauthorized use of this service.
- **Justification 17:** We are making this change to clarify the consequences of fraudulent use of the service.
- **Change 18:** We are adding additional selections to the state dropdown menu on the “Create an Account” screen.
  - o **New Language:** Armed Forces Africa, Armed Forces Americas, Armed Forces Canada, Armed Forces Europe, Armed Forces Middle East, Armed Forces Pacific.
- **Justification 18:** Armed Forces Postal Address/Fleet Postal Address (APO/FPO) selections are valid US postal addresses customers should be able to select upon registering.
- **Change 19:** We are adding additional selections to the state dropdown menu on the “Add Extra Security” screen.

- o **New Language:** Armed Forces Africa, Armed Forces Americas, Armed Forces Canada, Armed Forces Europe, Armed Forces Middle East, Armed Forces Pacific.
- **Justification 19:** Armed Forces Postal Address/Fleet Postal Address (APO/FPO) selections are valid US postal addresses customers can select when registering.
- **Change 20:** We are adding additional selections to the state dropdown menu on the RCS “Create Account” page.
  - o **New Language:** Armed Forces Africa, Armed Forces Americas, Armed Forces Canada, Armed Forces Europe, Armed Forces Middle East, Armed Forces Pacific.
- **Justification 20:** Armed Forces Postal Address/Fleet Postal Address (APO/FPO) selections are valid US postal addresses customers can select when registering.
- **Change 21:** We are adding additional selections to the state dropdown menu on the RCS “Add Extra Security” page.
  - o **New Language:** Armed Forces Africa, Armed Forces Americas, Armed Forces Canada, Armed Forces Europe, Armed Forces Middle East, Armed Forces Pacific.
- **Justification 21:** Armed Forces Postal Address/Fleet Postal Address (APO/FPO) selections are valid US postal addresses customers can select when registering.
- **Change 22:** We are adding additional selections to the state dropdown menu on the RCS “Remove Extra Security” page.
  - o **New Language:** Armed Forces Africa, Armed Forces Americas, Armed Forces Canada, Armed Forces Europe, Armed Forces Middle East, Armed Forces Pacific.
- **Justification 22:** Armed Forces Postal Address/Fleet Postal Address (APO/FPO) selections are valid US postal addresses customers can select when registering.