

**Justification for Non-Substantive Changes for
Domestic Direct Deposit Application
31 CFR 210
OMB No. 0960-0634**

Background

SSA's Direct Deposit application delivers Social Security benefits or Supplemental Security Income (SSI) payments into financial institution accounts quickly and safely. This application disburses direct deposit funds through the Automated Clearing House system to acceptable financial institutions including banks, savings and loan, and credit unions. The financial institutions credit the recipients' accounts with their Social Security benefit or SSI payments. SSA offers Direct Deposit via our Internet Direct Deposit Application, our Automated 800 Number, and through in-person interviews within our field offices or via SSA's National 800 Number.

During a systematic review of SSA's collections, we noticed we inadvertently overlooked the Intranet screens used within the field offices and through the national toll-free number, as well as the Automated Telephone versions of the Direct Deposit collection when we last obtained approval for SSA's domestic Direct Deposit application. To rectify this, we are adding all of the other modalities through which we collect the direct deposit information to this collection, and changing the name of the collection to reflect the multiple modalities we use.

SSA intends to implement these changes on August 1, 2012.

Revisions to the Collection Instruments

- **Change #1:** We are updating the title II Internet Direct Deposit Application, and adding the My SSA Internet Service screens to this Information Collection

Justification #1: SSA uses Direct Deposit/Electronic Funds Transfer (DD/EFT) enrollment information received from beneficiaries to facilitate DD/EFT of their Social Security benefits with a financial institution. Beneficiaries who want to enroll in Direct Deposit or change their Direct Deposit account through the Internet fill out the Internet Direct Deposit Application with information such as their bank account number and the routing number of their financial institution.

The new MySSA Direct Deposit application will replace the existing stand-alone Internet Direct Deposit application and allow authenticated users to sign-up or make updates to their Direct Deposit behind the MySocialSecurity portal. The MySSA Direct Deposit application will continue to provide the same level of service as the current stand-alone Internet Direct Deposit application.

The updated look and feel to the MySSA Direct Deposit screens will have similar color schemes and format to other Social Security Administration online services, such as www.socialsecurity.gov, iClaims (0960-0618), and the i3668 (0960-0579). We are providing a consistent user experience across the online services for beneficiaries who use the Internet

to enroll in DD/EFT. The Direct Deposit screens that are part of the Internet packages for iClaim and the i3368 will remain the same, and will show the same information as the MySSA Direct Deposit application.

- **Change #2:** We are adding the title II Direct Deposit Automated 800 # Service call flow

Justification #2: As part of SSA's established Automated Telephone Services, we also provide a process for beneficiaries who want to enroll in Direct Deposit or change their Direct Deposit account over the phone. Beneficiaries must provide information such as their bank account number and the routing number for their financial institution. As with our other Automated Telephone Services applications, all respondents must undergo a knowledge-based authentication process through our Request for Internet Services – Authentication; Automated Telephone Speech Technology – Authentication service (0960-0596) before they can select Direct Deposit. Once beneficiaries complete authentication, they can start, stop, or revise their direct deposit just as they can via the Internet.

- **Change #3:** We are adding the title II and title XVI Intranet screens used within the field offices and via the National 800 number to collect Direct Deposit application information via a personal interview with the applicant

Justification #3: SSA uses these Intranet screens within the field office or via the National 800 Number to initiate Direct Deposit or make changes to a Direct Deposit account during a personal interview with the respondent. This allows beneficiaries who require or prefer personal contact to update their banking information with SSA. SSA staff collects Direct Deposit information using one of the following systems (dependent on the reasons for personal interview):

- Court Ordered Garnishment Screens (COGS)
- Manual Adjustment Credit and Award Data Entry System (MACADE)
- Modernized Claim System (MCS)
- Representative Payee System (RPS)
- Single Payment System (SPS)
- Post-Entitlement System (POS)
- Critical Payment System (CPS)
- Electronic 101 System (E101)
- Automated 101 system (A101)
- Modernized Supplemental Income Claims System (MSSICS)
- SSI ePath System

We provide screens for all of these systems within the Information Collection screen for the Intranet versions of the Direct Deposit Application.

- **Change #4:** We are adding the title II and title XVI Direct Deposit Fraud Indicator Application

Justification #4: This new initiative acts as a preventive measure to prevent unwanted changes to Direct Deposit accounts initiated through auto-enrollment. SSA will provide a service in our FOs to title II beneficiaries and title XVI recipients to prevent unwanted (auto-enrollment) transactions. We also will offer beneficiaries and recipients this service as a preventive measure. This is an intranet application accessed through the Intranet Main Menu (IMain).

The new Direct Deposit Fraud Indicator Intranet Application facilitates the placement of an auto-enrollment fraud block on title II and title XVI records. The technician will access iMain and complete the auto-enrollment screens. The screens will provide the option to start and stop the auto-enrollment block. Input of these screens will update the Direct Deposit fraud prevention indicator to the client’s record in real-time.

- **Change #5:** We updated our burden chart for the Direct Deposit Application to include the Automated Telephone Service, the new Direct Deposit Fraud Indicator, and the in-person interview process:

| Modality of Collection | Number of Respondents | Frequency of Response | Average Burden Per Response (minutes) | Estimated Total Annual Burden (hours) |
|--|------------------------------|------------------------------|--|--|
| Internet Requestors (through MySSA, iClaim, and i3368) | 188,129 | 1 | 10 | 31,355 |
| Personal Interview (Intranet screens in field office or through National 800 Number) | 6,455,815 | 1 | 12 | 1,291,163 |
| Automated Telephone Services | 237,065 | 1 | 8 | 31,609 |
| Direct Deposit Fraud Indicator | 10,000 | 1 | 2 | 333 |
| Totals | 6,891,009 | | | 1,354,460 |

Justification #5: We updated the number of respondents for the Internet version to reflect current management information. All of the numbers in the above chart reflect the local management information for 2011. We also believe the number of respondents for Internet services increased due to the agency encouraging the use of electronic services and our population of beneficiaries becoming more comfortable with the use of these electronic

services. In addition, as we mentioned above, we are including the burden for those modalities we did not previously include in this information collection.