## Justification for the Non-Substantive Change For Application Status 20 CFR 401.45 OMB No. 0960-0763

## **Justification for the Non-Substantive Change**

## Changes to the existing Automated Telephone Application for Application Status

The agency is in the process of replacing the current infrastructure that maintains the National 800 Number Network (N8NN) Telephone System. The name of the project under which we will implement the new infrastructure is "Citizen Access Routing Enterprise (CARE) Through 2020," and a vendor contract to complete the task was awarded to AT&T in September 2010.

In preparing for implementation of CARE Through 2020, we had an outside consultant (i.e. Strategic Contact, Inc. and Enterprise Integration Group, Inc. (SCI/EIG) study our current network and provide us with recommendations for improving the N8NN business processes. Our goals are to 1) improve the processes by shortening the time it takes to navigate through the system, where feasible, 2) enhance customer satisfaction which significantly declined during FY 2009, and 3) improve the overall effectiveness and efficiently of the N8NN. Findings provided in the FY 2009 N8NN Customer Satisfaction Report, developed by the Office Quality Performance (OQP), indicated that customer satisfaction with 800 Number services significantly declined due to dissatisfaction with automated services.

The SCI/EIG study report was consistent with OQP's report in regards to customer satisfaction. SCI/EIG provided a number of recommendations to help improve customer satisfaction.

As a result, coordinated efforts between the Office of Telephone Services (OTS) and the vendor AT&T revamped SSA's automated N8NN Interactive Voice Recognition (IVR) Services. The changes will become effective in late fall 2012, when we implement the N8NN IVR Service. This date may be delayed due to any unforeseen changes in the CARE Through 2020 transition schedule.

## **Summary of the Changes**

A separate Knowledge-Based Authentication (KBA) Dialog module (*see section 2.8 of the User Interface Specification document*) has been created to authenticate individuals using the automated telephone applications to request information from SSA records or to make changes to SSA records. Within the KBA Dialog module, both the Privacy Act Statement (*see section ka0230\_PrivacyActDetails\_DM of the User Interface Specification document*) and Paperwork Reduction Act Statements (*see section ka0240\_PaperworkActDetails\_DM of the User Interface Specification document*) are made available to the individual. The individual can opt out of not hearing the entire statements and continue to the Perjury Statement (*see ka0270\_PerjuryMessage\_DM of the User Interface Specification document*). The individuals

have to understand and agree to the terms of the Perjury Statement in order to continue through automation.

Once the individuals agree to the terms, they will be directed to the KBA data collection module. Based on the request, they will be instructed to provide the KBA data elements needed for authentication.

In this case, they will be sent to the Application Status KBA data collection module where their SSN and date of birth will be collected. Once authenticated, the 8-digit confirmation number will be collected.

**Note:** The KBA data elements for Application Status have not been changed, specifically; the SSN and DOB will continue to be collected along with the 8-digit confirmation number as with the current process. The changes to the automated telephone applications will be seamless to the callers.