

**Justification for Non-Substantive Changes for
SSI Monthly Wage Reporting
20 CFR 416.701-732
OMB No. 0960-0715**

Justification for Non-Substantive Changes to the Collection

Background

SSA intends to add the Supplemental Security Income Mobile Wage Reporting (SSIMWR) application to the existing information collection for the Supplemental Security Income Telephone Wage Reporting (SSITWR) initiative. In July 2010, SSA renewed the information collection for the SSITWR. We are not changing the current telephone process; rather, we are proposing to pilot a new, smartphone-based, user interface as an alternate service channel to the SSITWR. The Supplemental Security Income (SSI) Mobile Wage Reporting application will use the existing SSITWR systems framework.

SSA intends to pilot this new smartphone wage reporting application as a response to mobile technology advances and their increased use. SSA is researching the development and implementation of an architecture which supports public-facing eService applications for mobile devices, or smartphones, as an alternative to its existing browser-based platforms and voice telephone systems.

Revisions to the Collection Instrument

Change #1: During the recruiting process, we will offer individuals the option to report prior monthly gross wages voluntarily using either SSITWR or SSIMWR. We will use the current recruiting process of engaging SSI recipients, deemors, and representative payees of SSI recipients to use these wage reporting options during the course of normal contact with SSA.

Justification #1: We will introduce the mobile application as an option to report wages. However, we will continue to advertise SSITWR. We will provide the users with the option to choose between the two modalities.

Change #2: With SSITWR, we currently provide instructions and information on the exclusive telephone number and the method of using their telephone to report wages. With SSIMWR, we will give the SSI recipients, deemors, and representative payees of SSI recipients instructions and information on the access code, downloading the application to the smartphone (including the Quick Response (QR) code), and instructions on how to report wages using their smart phone.

Note: The QR code provides quick and effortless access to download the SSIMWR application. Users with a camera phone equipped with the correct reader application can scan the image of the QR Code, which will take them directly to the SSIMWR application in the Apple or Android store. Users will see a short description of the application stating the following:

Are you receiving Supplemental Security Income (SSI) and working? Or, are you required to report your wage earnings because of your involvement with someone receiving SSI? If so, report your wages using our new SSI Mobile Wage Reporting App. Consistent monthly wage reporting helps prevent improper payments, which may cause SSI overpayments and underpayments.

This application will allow SSI recipients and representative payees to report monthly wages from the convenience of their smartphones.

Currently this application is for a limited audience and is only available in certain areas. Please contact your local Social Security field office to see if it is available in your area.

In addition, any time you have a question about Social Security, it is easy to get a quick answer using our mobile-friendly Frequently Asked Questions page. Just go to www.socialsecurity.gov/faq from your mobile device.

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Justification #2: We are providing the user with instructions on reporting their wages, either using SSITWR or SSIMWR.

Change #3: Currently, with SSITWR, users must dial the exclusive phone number, speak to pass authentication, and speak to input all information (including wages). With SSIMWR, users will open the application on their smartphone, key the access code, and key in the information needed for both authentication and to enter wages. SSITWR and SSIMWR systems collect the same information and send it to SSA over secure channels.

Justification #3: Users will have the option to submit wages on their smartphone through our mobile application.

We plan to implement the pilot in November 2012, upon OMB approval.

The Pilot

We plan to release the SSIMWR pilot on November 1, 2012. We expect public use to begin in November 2012. SSA's evaluation of the initial phase of the SSIMWR pilot will determine the

length and duration of the entire pilot.

The pilot will consist of representation from all ten regions. We will send out a pilot solicitation announcement to each of our regions requesting five offices (totaling 50 offices) with medium to high SSI traffic. We are attempting to recruit a minimum of 300 users with a maximum of 5,000 users.

Because this project mirrors SSITWR, we echoed the SSITWR recruitment package; modified to support the changes listed above. The recruitment package consists of:

- An introduction to the packet and an explanation of the ability to report SSI wages via smartphone.
- How to download the application through Android Play and Apple iTunes Markets.
- An explanation of the reporting timeframe or schedule.
- A list of what is needed to report wages using the smartphone application.
- A definition of the “Wage Earner.”
- A description of how to download the application to a smartphone.
- An explanation of determining total wages each month using the worksheets included. The worksheets allow the claimant a simple method of keeping their own records.
- An access code.
- A Quick Response (QR) code.

SSA will move the application into production and make it available for public download in October 2012. Because of the Goldberg/Kelly dates, which restrict users to submit their wages during the beginning of the month during certain timeframes (first 7-9 days), public use will begin in November 2012.

At the conclusion of the pilot, we plan to evaluate, analyze, and measure its success. After which, our plan is to continue to roll out to the rest of the nation.

Screen Description

After downloading the application, Wage Reporters will open the application, enter their access code, and click “Next.” After clicking “I agree” to the Terms of Service, Users will input:

- First Name
- Last Name
- (Other Last Name) if applicable
- Date of Birth
- SSN

Users will click “Next” to confirm the information they entered, or “Edit” to revise the information they entered. Once they confirm their information by clicking “Next,” users will identify who they are reporting wages for (self, other person or both) and click “Next” again to enter wages for the prior month.

If the user chooses *self*, they will enter information for themselves and report their own wages.

If the user chooses *other*, they will enter their own information, the other’s SSN, and the other’s wages. If the user chooses *both*, they will enter their information and wages, and then the application gives them the option to enter the other’s SSN and wages.

After confirming and submitting wages, the application will present a screen confirming wage input was successful, and will give the option to log out or submit more wages. The user will receive a log out confirmation screen stating “You Have Been Logged Out.” The SSI recipient or representative payee will receive a receipt subsequent to each successful wage report.

Justification

Expanding this reporting methodology is one of the targets we cited in SSA’s “Fiscal Year 12 Performance and Accountability Report.” We intend to pilot the SSIMWR and determine whether such a system will provide an additional, effective, channel for reporting wages in a timely manner to prevent wage-related improper payments. We also intend to determine whether there is a sufficient user base to warrant expansion of a smartphone application. SSIMWR fully automates monthly wage reporting by allowing the respondents to report monthly wages by entry into a smartphone application instead of using resources at the local level. As we continue to streamline the wage-reporting process, SSI Mobile Wage Reporting will allow for even further increased processing.

Burden Information

At this time, we are not requesting an adjustment to the response or training/instruction burden information, as we expect the recruitment process for SSIMWR will take the same amount of time as the current SSITWR process. The smartphone recruitment packet mirrors the SSITWR packet (with the addition of application download instructions as well as the mobile application instruction in place of the current automated telephone instructions). We expect the user to take the same amount of time to read, gather information, and respond. Therefore, we did not include a separate burden in the chart below for SSIMWR training.

Estimates of Public Reporting Burden (0960-0715 package)

Collection Method	Number of Respondents	Frequency of Response	Number of Responses	Average Burden per Response (minutes)	Estimated Total Annual Burden (hours)
Training/ Instruction	85,000	1	85,000	35	49,583
SSITWR	80,000	12	960,000	5	80,000
SSIMWR	5,000	12	60,000	3	3,000
Totals	85,000*		1,105,000		132,583

*Currently, 85,000 total respondents use SSI Monthly Wage Reporting via telephone. We do not expect this number to change with the addition of SSIMWR.

The total burden for this ICR is **132,583 hours**. This figure represents burden hours, and we did not calculate a separate cost burden.

