

**Justification for Non-Substantive Changes to Form SSA-827
Authorization to Disclose Information to the Social Security Administration (SSA)
20 CFR 404.1512 and 416.912, 45 CFR 160 and 164
OMB No. 0960-0623**

Revisions to the Collection Instruments

On October 3, 2011, SSA obtained OMB approval for the SSA-827 renewal clearance package. The clearance package contained an addendum outlining a proposal for SSA's new electronic authorization process (eAuthorization) for Form SSA-827. At that time, the screens SSA submitted for eAuthorization were in draft form with approval contingent on providing final screens using the Change Request process.

On February 13, 2012, SSA obtained OMB approval for a Change Request for an Internet click and sign electronic authorization process for adult first party claimants who file disability applications and appeals online. We indicated future releases would include an electronic authorization process for adult claimants who file in-office and by telephone. This Change Request includes the verbal attestation component for in-office and telephone filers for eAuthorization.

Background

Since 2004, SSA began using alternative signature methods to the traditional pen-and-ink or "wet" signature to expand electronic processing and implement a fully electronic application process. To date, SSA successfully processed millions of applications filed using approved alternative signature methods, such as click and sign for applications filed online and attestation for applications taken in person and over the telephone. SSA continues to expand the use of alternative signature methods whenever possible.

Effective April 2012, SSA gave the option to electrically sign and submit Form SSA-827 via new Internet screens to adults filing for disability benefits online on their own behalf. Beginning August 2012, adult claimants filing disability appeals online can also electronically sign and submit the form using those same Internet screens.

Plans are underway to expand this efficiency to adult first party claimants who apply for disability benefits or file appeals during in-office and telephone interviews, and during the continuing disability reviews (CDRs) process. When obtaining the SSA-827 during the in-office or telephone interview or review, the claims representative (CR) will 1) ask the claimant if they have read the form, and 2) answer any questions the claimant may have concerning the form. The CR will use scripted language to confirm the claimant's intent to authorize the release to SSA of all medical records and other information related to the claimant's ability to perform tasks. The CR will attest to the claimant's intent to authorize disclosure by clicking the "Attest, Submit, & Print" button. The CR provides a printed copy of the electronically signed SSA-827 to the claimant.

SSA and designated state agency employees will have the option to use attestation to obtain a new form SSA-827 from adult claimants when needed (such as when the SSA-827 expires prior to adjudication) using the steps described above for the CR.

Timeframe for implementation

We plan to implement the attestation process in December 2012. See the uploaded EDCS and eView final screens. CRs will use the EDCS screens during in-office and telephone interviews for initial claims and CDRs. SSA and designated state agency employees will use the eView screens when obtaining a new SSA-827 from a claimant.

Future Releases

We continue to work towards expanding eAuthorization to disability claims involving third parties and children. We will submit final versions of those screens as well as any updated burden data via the Change Request process when we are ready to implement them.