

**Justification for the Non-Substantive Changes for
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

Background

The Social Security Administration’s Public Credentialing and Authentication Process (hereafter called “electronic access”) went live to the public in May 2012. In the Information Collection Request OMB approved on 9/30/11 for release one (R1) of electronic access, the Social Security Administration (SSA) discussed the phased rollout plan for our new online electronic access authentication process. R1 of electronic access established a mechanism for customers to create an account, obtain a credential and access our online services through a new Internet portal, the *mySocialSecurity* website. In addition, we introduced the registration and customer support (RCS) intranet application, which provides an interface for authorized SSA personnel to respond to customers’ requests for assistance with electronic access.

The present change request covers release two (R2) enhancements to the electronic access Internet application and the RCS Intranet application, scheduled for implementation in December 2012. These enhancements include minor revisions to screen language and buttons, as well as minor enhancements to functionality, intended to improve usability. In addition, R2 will add new versions of four online applications for Social Security beneficiaries. With R2, the following beneficiary applications will be deployed behind the *mySocialSecurity* portal: benefit verification, change of address, check your benefits, and direct deposit. These applications have their own OMB clearance numbers. We are migrating all online beneficiary service applications which rely on PIN/password (PPW) and some beneficiary service applications which rely on knowledge-based authentication (KBA) to the *mySocialSecurity* website; we will decommission the current versions of these applications. We will also decommission the Password Request Code (PRC) system used for issuing PPWs to beneficiaries. On 9/25/12, OMB approved a Change Request for 0960-0632 (PPW/PRC) to transition some of the above applications and functions to 0960-0789. Please see the Change Request for 0960-0632 for further details regarding this transition. In addition, on 9/28/12, OMB approved a regular Information Collection Request for 0960-0596 (KBA) in which we supplied additional details on the decommissioning transition plan for the KBA beneficiary applications.

Revisions to the Collection Instrument

RCS intranet changes:

- **Change 1:** We are renaming the “New Search” button “Clear Search” and moving it next to the “Search” button on all RCS intranet screens. We are adding the Clear Search button to any screens which do not currently have the “New Search” button.

Justification 1: We are making this change for clarity and consistency.

- **Change 2:** We are adding the Sample Notices container to all RCS intranet Search screens.

Justification 2: We are making this change for clarity and consistency.

- **Change 3:** We are adding a client header; changing the title of the account status container; clarifying the messaging in the container; and adding the Block Access button on the “No Account Found” screen:

Old Language: You searched for SSN/User Name – This account does not exist.

New Language: No Account Found – There is no account for SSN/User Name

Justification 3: We are making this change to enhance usability and make block access functionality more accessible.

- **Change 4:** We are adding a client header; changing the title of the account status container; clarifying the messaging in the container; and adding the “Block Access” button on the Account Pending screen:

Old Language: You searched for SSN/User Name – This account is pending activation.

New Language: Account Pending – This account is pending activation. An activation code letter was requested on [date].

Justification 4: We are making this change to enhance usability and make block access functionality more accessible.

- **Change 5:** We are adding functionality to RCS to block and restore access to SSA electronic services. This is existing functionality, accessible from the Social Security website and other service channels, allowing customers to block electronic access to their Social Security record. We added the “Block” button to all search results RCS screens where the SSA employee can block an SSN. If the account is already blocked, then the screen may show the buttons “Unblock” and “Deny Unblock” in place of “Block.” Unblock/deny unblock functionality is available only to authorized SSA employees. Currently a mainframe component of the legacy PPW infrastructure, we are integrating it into the RCS platform in R2. This Block/Unblock functionality will be available through RCS whether the customer has an electronic access account or not.

Justification 5: We are moving this functionality to RCS as part of the PPW decommissioning process.

- **Change 6:** We are adding additional transactional data to the User Search screens which will display error conditions, registration failure information, account restrictions, account

status, and timestamps of recent support events. In the account summary container, the system will display the following fields, as appropriate depending on the screen, account status, and credential level: Last Login, Block Type, Block Reason, Block Date, Block Location, and Last 4 Digits of Cell Phone. In addition, the system will display a Transaction History tab if any transactions exist for the current customer's SSN. The Transaction History tab will navigate to the Transaction History screen, described below.

Justification 6: We are making this change to enhance usability and provide access to transaction history.

- **Change 7:** We are adding a Transaction History screen which will display designated customer transactions related to electronic access account activity. This Transaction History tab will display regardless of whether the customer has an electronic access account; however, it will only display if transactions exist for the current customer's SSN.

Justification 7: We are adding this new functionality to provide SSA employees with transactional data which will allow them to assist customers more effectively.

- **Change 8:** We are renaming the "Unlock Account" button "Unlock" and moving it from the right hand side of the account summary box to underneath the account status information.

Old Language: Unlock Account

New Language: Unlock

Justification 8: We are making this change to enhance usability.

- **Change 9:** We are renaming the "Remove Extra Security" button "Mail Reset Code" on the extra security one time password Account Summary Screen.

Old Language: Remove Extra Security

New Language: Mail Reset Code

Justification 9: We are making this change to properly define the function of this button on this screen.

- **Change 10:** We are renaming the "Print" button "Reprint," and removing the sample notice from the successful enrollment confirmation screens.

Justification 10: We are making this change to clarify the function of the "Reprint" button, and to remove the superfluous sample notice display.

- **Change 11:** We are adding address editing capability and adding an "Edit Address" button to the Add Extra Security – Unable to Verify Address screen.

Justification 11: We are making this change to give the SSA representative the opportunity to correct the address if it someone inadvertently entered it incorrectly.

Electronic Access Internet Changes:

- **Change 12:** We are adding language to the Terms of Service on the Create an Account, Reset/Disable Extra Security, and Add Extra Security screens.

New language: When we make a verification request to establish your account, Experian may use information from your credit report to help verify your identity. As a result, you may see an entry called a “soft inquiry” on your Experian credit report. This will show an inquiry by the Social Security Administration with our address and the date of the request. Soft inquiries do not affect your credit score, and you do not incur any charges related to them. Soft inquiries are displayed in the version of the credit profile viewable only to consumers and are not reported to lenders. The soft inquiry will not appear on your credit report from Equifax or TransUnion, and will generally be removed from your Experian credit report after 25 months. Once you have registered for an online account, you will not generate additional soft inquiries by logging in to access our services.

Justification 12: We are adding language to clarify the role of the External Data Service (EDS) SSA uses in the authentication process.

- **Change 13:** We are adding language to the Privacy & Security Questions Help Page.

New language: We may use an identity verification service provided by Experian to help verify your identity and protect your privacy when you register to do business with us online. When we make a verification request to establish your account, Experian may use information from your credit report to help verify your identity. As a result, you may see an entry called a “soft inquiry” on your Experian credit report. This will show an inquiry by the Social Security Administration with our address and the date of the request. Soft inquiries do not affect your credit score, and you do not incur any charges related to them. Soft inquiries are displayed in the version of the credit profile viewable only to consumers and are not reported to lenders. The soft inquiry will not appear on your credit report from Equifax or TransUnion, and will generally be removed from your Experian credit report after 25 months. Once you have registered for an online account, you will not generate additional soft inquiries by logging in to access our services.

Justification 13: We are adding language to clarify the role of the EDS SSA uses in the authentication process.

- **Change 14:** We are removing error message language directing customers to the mailed *Social Security Statement* option.

Old language: If you would like to receive your *Social Security Statement* by mail, please follow [these instructions](#).

New Language: [NULL]

Justification 14: We are removing this option because SSA suspended mailing of the *Social Security Statement*.

- **Change 15:** We are changing error message language providing information on how to contact SSA.

Old language: This suspension will not affect any Social Security benefits you receive. If the information you provided is correct, please visit a local office or call 1-800-772-1213 (TTY 1-800-325-0778) for help with updating your records.

New Language: This suspension will not affect any Social Security benefits you receive. For further assistance, please [visit a local office](#) or call 1-800-772-1213 (TTY 1-800-325-0778).

Justification 15: We are changing this language to provide more inclusive, generic language to error messaging screens. Note: individuals who SSA bans from visiting SSA field offices will receive the same message as shown in the New Language above, with the exclusion of the words “[visit a local office](#) or.”

- **Change 16:** We are changing error message language providing information on how to contact SSA.

Old language: Please [visit a local office](#) or call 1-800-772-1213 (TTY 1-800-325-0778) for more help.

New Language: For further assistance, please [visit a local office](#) or call 1-800-772-1213 (TTY 1-800-325-0778).

Justification 16: We are changing this language for clarity and consistency in error messaging screens. Note: individuals who SSA bans from visiting SSA field offices will receive the same message as shown in New Language, with the exclusion of the words “[visit a local office](#) or.”

We plan to implement the above, R2 revisions in mid-December after OMB approves this Change Request.