

**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

Background

In 2004, SSA began using alternative signature methods to the traditional pen-and-ink signature to expand electronic processing and provide better service to the public. To date, SSA successfully processed millions of applications filed using approved alternative signature methods. Since April 2012, over 94% of claimants who are eligible to use eAuthorization have chosen to do so.

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 2/13/12, SSA obtained OMB approval for an eAuthorization process for adult first party claimants who file disability applications and appeals online. On 9/25/12, SSA obtained approval for adult first party claimants who apply for disability benefits or file appeals during in-office and telephone interviews, and during the continuing disability review (CDR) process. Claimants filing online use the alternative signature method of click and sign to sign and submit their authorizations whereas in-office and telephone filers use the attestation method. In the Change Requests for each of these, we mentioned future plans and releases, including third parties and childhood claims.

Currently, SSA is expanding this efficiency to claims involving childhood applications, appeals, and CDRs filed in-office and by telephone using the attestation method. eAuthorization will be available for childhood claims where state law permits the children to sign on their own behalf or where an individual with the authority to sign on behalf of a child signs the SSA-827.

Revisions to eAuthorization

As with our current eAuthorization process with adult first party claimants, when obtaining the SSA-827 during the in-office or telephone interview or review for childhood claims, the claims representative (CR) will (1) ask the claimant or individual if they have read the form, and (2) answer any questions the claimant or individual may have concerning the form. The CR will use scripted language to confirm the claimant's or individual'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 or individual's intent to authorize disclosure by clicking the "Attest, Submit, & Print" button. The CR provides a printed copy of the signed SSA-827 to the claimant or individual.

0960-0623 (SSA-827) non-substantive change
1/29/2021

Revisions to the Burden

Through implementing these revisions, we estimate approximately 180,115 more respondents will be eligible to electronically sign and submit the SSA-827 through eAuthorization for in-office and telephone transactions involving children. Therefore, we are revising our burden chart for this Information Collection Request as follows:

Modality of Completion	Number of Respondents	Frequency of Response	Number of Responses	Average Burden Per Response (minutes)	Estimated Total Annual Burden (hours)
SSA-827 with electronic signature (eAuthorization)	2,710,115	1	2,710,115	9	406,517
SSA-827 with wet signature (paper version)	1,411,436	1	1,411,436	10	235,239
Reading the Internet Instructions	708,100*	1	708,100	3	35,405
Totals	4,121,551		4,829,651		677,161

*The respondents who read the Internet instructions are a small portion of the 4,121,551 total respondents for this collection. Therefore, we did not include them in the total number of respondents listed in the final line of the chart.

Timeframe for implementation

We plan to implement the next phase of eAuthorization in July 2013 using revised EDCS and eView screens to include childhood claims. CRs will use the EDCS screens during in-office and telephone interviews for initial childhood claims, appeals, and CDRs. SSA and designated state agency employees will use the eView screens when obtaining a new SSA-827 from a claimant or individual during the adjudication process.

Future Releases

We continue to work towards expanding eAuthorization to online transactions involving third parties and childhood claims. 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.