

**Supporting Statement for Social Security Benefits Application:
Form SSA-1: Application for Retirement Insurance Benefits
Form SSA-2: Application for Wife’s or Husband’s Insurance Benefits
Form SSA-16: Application for Disability Insurance Benefits
Internet Claim (iClaim) Application Screens
Internet Appointment (iAppointment) Application Screens
20 CFR 404.310-404.311, 404.315-404.322, 404.330-404.333, 404.601-404.603, and 404.1501-
404.1512
OMB No. 0960-0618**

A. Justification

1. Introduction/Authoring Laws and Regulations

The Social Security Administration (SSA) provides Retirement, Survivors, and Disability benefits to members of the public who meet the required eligibility criteria, and who file the correct application (as per Sections 202(b)-(c) and 223 (a) of the *Social Security Act (Act)* and Sections 20 CFR 404.310-404.311, 404.315-404.322, 404.330-404.333, 404.601-404.603, and 404.1501-404.1512 of the *Code of Federal Regulations*). The public can apply for the appropriate benefit type using one of three modalities: 1) a paper application (form SSA-1, SSA-2, or SSA-16); 2) a field office interview, during which SSA employees enter applicant data directly into the Modernized Claims System (MCS); or 3) iClaim, an online system allowing members of the public to apply electronically. Third-party representatives of applicants can use any of these modalities to apply for the applicants they represent.

2. Description of Collection

SSA will use the information gathered by the multiple information collection tools in this Information Collection Request (ICR) to determine if applicants are eligible for specific Social Security benefits and the amount of the benefits. The respondents are applicants for retirement, survivors, and disability benefits under title II of the Social Security Act.

The following is a list and description of these information collection instruments:

Paper Application Forms:

SSA-1 – Application for Retirement Insurance Benefits: SSA uses Form SSA-1 to determine individuals’ entitlement to retirement insurance benefits. When individuals file for Medicare-only with a paper application, we rename it the “Application for Hospital Insurance” with pen-and-ink changes, and collect only the information needed for hospital insurance.

SSA-2 – Application for Wife’s or Husband’s Insurance Benefits: SSA uses Form SSA-2 to determine individuals’ entitlement to their spouses’ insurance benefits.

SSA-16 – Application for Disability Insurance Benefits: SSA uses Form SSA-16 to determine individuals’ entitlement to Disability Insurance benefits under title II of the Act.

SSA makes paper copies of these forms available in field offices; however, since the applications are also part of iClaim, we did not make the paper forms available on our website.

In-person interview/MCS Screens:

MCS mirrors the paper application formats using an electronic collection method. Guided by the MCS collection screens, an SSA representative interviews the applicant and inputs the information directly into SSA's application database. MCS prompts the representative with the required questions based on the type of application the applicant files, and the applicant's initial responses.

MCS also propagates information to other screens in the application. In contrast to the paper application, the in-person interview/MCS process offers the following advantages: 1) it improves accuracy in recording responses, 2) it reduces the overall interview time, and 3) it reduces the number of times we have to re-contact applicants to clarify responses.

Internet Claim (iClaim) Application:

iClaim is an online platform applicants can use to apply for several types of Social Security benefits. Depending on their initial answers, the program presents applicants with different screens, ensuring they only respond to relevant questions. After completing the online application, claimants or their third-party representatives can submit it electronically to SSA, avoiding the need to visit an SSA office. iClaim is more convenient for users and reduces their application completion time by eliminating the need for an office visit. This also saves time and resources for SSA.

There are two ways to complete and submit iClaim. **First-party iClaim respondents** are beneficiaries who complete and submit the entire application online on their own behalf. They may have to submit supplementary supporting documents (e.g., medical evidence for disability benefits applications) to finalize their application. **Third-party iClaim respondents** are representatives of claimants who complete iClaim on behalf of the claimants. Once these third parties submit the online iClaim application, SSA will send application summaries and confirmation notices (included in our online ICR) to the first parties, or claimants, whom they represent. The claimants must sign the application summary confirming the information and submit it to SSA. Once SSA receives the application summary (and whatever additional supplementary information is necessary) we can process the application.

SSA is adding new functionalities to the iClaim system to collect information required for claims development in MCS. This ICR also includes all three benefits application modalities for retirement, spouses, and disability applications. In this ICR, we are adding the following functions to the iClaim system:

- Simpler view that provides a more logical step by step description of the online process
- Enhanced screens to provide us the opportunity to add functionality and make

- collecting data more dynamic and customized to claimant
- Re-organization of questions to differentiate the benefit type and benefit requirements
- Deleted questions that no longer align with our current policy
- Enhanced features within the screens to display definitions and informational boxes
- New language and buttons that provide clearer instructions

Internet Appointment (iAppointment) Application:

iAppointment is an online process that allows members of the public, who are unable to complete an iClaim application because they failed our initial verification checks, an easy-to-use method to schedule an appointment in the servicing office of their choice. iAppointment allows customers to establish a protective filing date for their application. Since the date they file can affect their benefits, iAppointment will provide respondents with information related to the date by which they must file their actual application.

The iAppointment application propagates information the applicant already entered into iClaim for SSN, name, date of birth, and gender. However, applicants must provide minimal additional information: mailing address; telephone number; language preference; type of appointment (Disability, Retirement, Medicare); and whether they prefer a telephone interview or in-office appointment. iAppointment is a customer-centric application.

If the available appointment times do not meet the customer's needs, iAppointment allows them to enter a different zip code to identify another field office, which may offer different appointment times. At this time, SSA only allows domestic first party applicants, or third parties applying for individuals who are sitting with them to use iAppointment. If users indicate they are filing as third parties, iAppointment provides a message directing them to call the National 800 Number for assistance. If a foreign first party user is unable to complete iClaim, iAppointment directs them to contact a Social Security representative, and provides a link to SSA's Service Around the World website.

3. Use of Information Technology to Collect the Information

SSA offers electronic versions of this information collection (specifically, MCS and iClaim) under the agency's Government Paperwork Elimination Act plan. Approximately 94% of respondents submit their applications via electronic methods.

4. Why We Cannot Use Duplicate Information

The nature of the information we are collecting and the manner in which we are collecting it preclude duplication. SSA does not use any other collection instrument to gather the data we are collecting here.

5. Minimizing Burden on Small Respondents

This collection does not significantly affect small businesses or other small entities.

6. Consequence of Not Collecting Information or Collecting it Less Frequently

If SSA did not collect this information, the public would have no way to apply for Social Security benefits, which would be a direct violation of regulations *20 CFR 404.310-404.311, 404.315-404.322, 404.330-404.333, 404.601-404.603, and 404.1501-404.1512*. Because we only collect the information once, we cannot collect it less frequently. There are no technical or legal obstacles to burden reduction.

7. Special Circumstances

There are no special circumstances that would cause SSA to conduct this information collection in a manner inconsistent with *5 CFR 1320.5*.

8. Solicitation of Public Comment and Other Consultations with the Public

The 60-day advance Federal Register Notice published on June 17, 2013, at 78 FR 36291, and we received no public comments. SSA published the second Notice on September 12, 2013, at 78 FR 56264. If we receive comments in response to the 30-day Notice, we will forward them to OMB. We did not consult with the public in the revision of this form.

9. Payment or Gifts to Respondents

SSA provides no payments or gifts to the respondents (except for actual benefits payments, if applicants qualify for them).

10. Assurances of Confidentiality

SSA protects and holds confidential the information we are requesting in accordance with *42 U.S.C. 1306, 20 CFR 401 and 402, 5 U.S.C. 552* (Freedom of Information Act), *5 U.S.C. 552a* (Privacy Act of 1974), and OMB Circular No. A-130. Additionally, SSA protects and holds confidential the information it receives by adhering to our Internet Privacy Policy, which stipulates:

- The public does not need to give us personal information to visit our site;
- We collect personally identifiable information (name, SSN, DOB or e-mail) only if we know beneficiaries or their representatives provided it;
- We only use personal identifying information in conjunction with services beneficiaries requested at the time they submitted the information to us;
- We sometimes perform statistical analyses of user behavior in order to assess customer interest in the various areas of our site. We will disclose this information to third parties only in aggregate, never specific form;
- We never give, sell, or transfer any personal information to a third party.

We also take the following measures to ensure the confidentiality of applicants' personal information:

- We encrypt all electronic requests using the Secure Socket Layer (SSL) security protocol. SSL encryption prevents a third party from reading the transmitted data even if they intercept any data. This protocol is an industry standard used by banks such as Wells Fargo and Bank of America for Internet banking;
- We give applicants adequate warnings that the Internet is an open system, and there is no absolute guarantee others will not intercept and decrypt the personal information the applicants submitted. We advise applicants about alternative methods of requesting personal information, i.e., personal visit to a field office or a call to the 800 number;
- We will only allow requestors access to additional screens used for making changes to personal information or requests to SSA once we verify requestor identity.

11. Justification for Sensitive Questions

The information collection does not contain any questions of a sensitive nature.

12. Estimates of Public Reporting Burden

Below we provide annual burden estimates for the multiple components of this information collection:

Form SSA-1

| Collection Method | Number of Respondents | Frequency of Response | Average Burden Per Response (minutes) | Estimated Annual Burden (hours) |
|---------------------|-----------------------|-----------------------|---------------------------------------|---------------------------------|
| MCS/Signature Proxy | 1,441,400 | 1 | 10 | 240,233 |
| Paper | 2,300 | 1 | 11 | 422 |
| Medicare Only MCS | 418,300 | 1 | 7 | 48,802 |
| Medicare Only Paper | 300 | 1 | 7 | 35 |
| Totals | 1,862,300 | | | 289,492 |

Form SSA-2

| Collection Method | Number of Respondents | Frequency of Response | Average Burden Per Response (minutes) | Estimated Annual Burden (hours) |
|---------------------|-----------------------|-----------------------|---------------------------------------|---------------------------------|
| MCS/Signature Proxy | 340,000 | 1 | 14 | 79,333 |
| Paper | 1,200 | 1 | 15 | 300 |
| Totals | 341,200 | | | 79,633 |

Form SSA-16

| Collection Method | Number of Respondents | Frequency of Response | Average Burden Per Response (minutes) | Estimated Annual Burden (hours) |
|--------------------------|------------------------------|------------------------------|--|--|
| MCS/Signature Proxy | 1,695,800 | 1 | 19 | 537,003 |
| Paper | 53,300 | 1 | 20 | 17,767 |
| Totals | 1,749,100 | | | 554,770 |

iClaim Burden Information

| Collection Method | Number of Respondents | Frequency of Response | Average Burden Per Response (minutes) | Estimated Annual Burden (hours) |
|---|------------------------------|------------------------------|--|--|
| iClaim 3 rd Party | 431,357 | 1 | 15 | 107,839 |
| iClaim Applicant after 3 rd Party Completion | 431,357 | 1 | 5 | 35,946 |
| First Party iClaim Domestic Applicant | 1,838,943 | 1 | 15 | 459,736 |
| First Party iClaim Foreign Applicant | 8,291 | 1 | 3 | 415 |
| Medicare-only iClaim | 552,400 | 1 | 10 | 92,067 |
| Totals | 3,262,348 | | | 696,003 |

iAppointment Burden Information

| Collection Method | Number of Respondents | Frequency of Response | Average Burden Per Response (minutes) | Estimated Annual Burden (hours) |
|--------------------------|------------------------------|------------------------------|--|--|
| iAppointment | 200,000 | 1 | 10 | 33,333 |

| | | | | |
|--------------------|------------------|--|--|------------------|
| Grand Total | 7,414,948 | | | 1,653,231 |
|--------------------|------------------|--|--|------------------|

The total burden for this ICR is **1,653,231** hours. This figure represents burden hours, and we did not calculate a separate cost burden

13. Annual Cost Burden to the Respondents (Other)

This collection does not impose a known cost burden to the respondents.

14. Annual Cost To Federal Government

The annual cost to the Federal Government is approximately \$7,735,300. This figure represents the cost for printing paper forms, salaries for the SSA representatives who conduct field office interviews with benefits applications, and the cost of making changes to and maintaining the iClaim system.

15. Program Changes or Adjustments to the Information Collection Request

The overall public reporting burden for this collection increased due to the addition of the more time-consuming foreign iClaim responses (which, while more convenient than an MCS field-office interview, take longer to complete). Another change to the burden collection is the removal of the individual line for MCS application by combining the MCS/signature proxy collections. We made this change because we now require signature proxy for every application we enter into MCS unless the respondent refuses attestation. The line for paper applications reflect the applications submitted with a wet signature, including any we take through MCS for which the respondent refused attestation.

16. Plans for Publication Information Collection Results

SSA will not publish the results of the information collection.

17. Displaying the OMB Approval Expiration Date

For the paper forms SSA-1, SSA-2, and SSA-16, OMB granted SSA an exemption from the requirement to print the OMB expiration date on its program forms. SSA produces millions of public-use forms with life cycles exceeding those of an OMB approval. Since SSA does not periodically revise and reprint its public-use forms (e.g., on an annual basis), OMB granted this exemption so SSA would not have to destroy stocks of otherwise useable forms with expired OMB approval dates, avoiding Government waste.

SSA is not requesting an exemption to the requirement to display the OMB approval expiration date for MCS or for the Internet (iClaim) application for forms SSA-1, SSA-2, and SSA-16.

18. Exception to Certification Statement

SSA is not requesting an exception to the certification requirements at 5 *CFR* 1320.9 and related provisions at 5 *CFR* 1320.8(b)(3).

B. Collection of Information Employing Statistical Methodologies

This information collection does not use statistical methods.