

**Justification for Non-Substantive Changes for
The SSI Monthly Wage Reporting
20 CFR 416.701-732**

OMB No. 0960-0715

Background

The Social Security Administration (SSA) requires Supplemental Security Income (SSI) recipients to report changes such as changes in income, resources, and living arrangements that could affect the receipt and amount of their SSI payments. SSI recipients can report monthly wages via the information collection (IC) SSI Monthly Wage Reporting. The IC's collection instruments, SSI Telephone Wage Reporting (SSITWR) system and the SSI Mobile Wage Reporting (SSIMWR) application, fully automate monthly wage reporting by allowing respondents to voluntarily report their prior month's wages via telephone or smartphone application instead of contacting their local SSA field office. The reporters either call a designated SSA toll-free telephone number or use the smartphone wage reporting application during the first through the sixth day of each month. The systems cutoff date dictate the 6-day reporting period (called Goldberg Kelly), and allows the reported wage amounts to post to the Supplemental Security Record in time to prevent potential overpayments and underpayments.

Justification

We are requesting expedited OMB approval of this request for non-substantive changes. We are not changing or increasing the overall public reporting burden. The systems enhancements described below serve to satisfy the Presidential memorandum, "Building a 21st Century Digital Government," which launched a comprehensive strategy aimed at delivering better digital services to the American people. These enhancements are designed to increase ease of use, understanding, and convenience to the public.

Goldberg Kelly (GK) System/Application Enhancement

As described above, the current GK systems cutoff date dictates a 6-day reporting period for reporters. However, with the GK systems enhancement release, SSA will extend the current wage reporting period allowing users to report wages during any day in the current reporting month. In addition, we will enhance the SSIMWR application by removing the access code currently needed to make wage reports. We will continue to encourage our users to report wages during the first six days of the month. If the reporter makes a wage report after the GK systems cutoff date, the reporter will receive a disclaimer message. These enhancements to SSITWR and SSIMWR will make it easier and more convenient for SSI recipients to report wages.

On June 5, 2013, OMB approved the Monthly SSI Wage Reporting information collection request (ICR). We did not include the Goldberg Kelly (GK) systems enhancement in the June 2013 ICR because we did not know at that time when the GK release would be ready for implementation.

Other Minor Changes to the Information Collection

- **Disclaimer Language GK Release both SSITWR and SSIMWR**

We will provide disclaimer language to the wage reporters only when they submit a successful wage report after the first 6 days of the month (GK systems cutoff date). The reporter will hear the mandatory disclaimer language when using SSITWR or will view it when using the SSIMWR application as follows:

“Because we received the report after (fill in current month and GK cutoff day) the wages you reported today might not be reflected in a future SSI payment. We will mail a notice if there are changes to the payment amount explaining these changes and your right to appeal.”

- **Web Link Wage Reporting Reminder both SSITWR and SSIMWR**

We will continue to encourage reporting wages through multiple platforms and to provide the wage reporter with an option to sign up for monthly reminders to report wages. We propose to add the web link for the monthly reminder to the SSIMWR screen shots, as well as the SSIMWR and SSITWR Participant Training Packages. The user can voluntarily sign up for the reminder via a web link, which reads: Wage Reporting Reminder: *You can now sign up for email or text reminders to report monthly wages for SSI at www.socialsecurity.gov/ssiwagereporting.* This reminder encourages the reporter to report wages timely.

- **SSITWR Changes**

We are not changing the current SSI telephone wage reporting process. The following changes are improvements due to the GK release to allow successful wage reports into the system throughout the current reporting month for the public’s convenience and to clarify instructions for the caller.

- **SSITWR Privacy Act Statement (PAS)**

We intend to add a prompt to the telephone system allowing the wage reporter to listen to the Privacy Act Statement (PAS), similar to the National 800 number prompt. The prompt gives the caller the option to listen to the PAS and the phone system presents the PAS to the caller before we collect any information. This provides convenience to the caller and eliminates the paper process.

- **SSITWR Participant Training Package (PTP) Fiscal Year 2014 (FY 14)**

Revisions to the PTP FY 14 for telephone wage reporting to benefit the wage reporter and clarify our instructions as follows:

- updated the monthly calendars through September 2014,
- Page 1 - reworded instructions under the heading “When you should call to report wages,”
- Page 3 - added a Wage Reporting Reminder and weblink, and
- Page 4 - updated the OMB expiration date.

- **SSIMWR Participant Training Package (PTP) FY14**

Revisions to the PTP FY 14 for mobile wage reporting to benefit the wage reporter and clarify our instructions as follows:

- o updated the PTP calendars through September 2014,
 - o Page 1 – reworded the instructions under the heading “When you should report wages,”
 - o Page 2 - added information for how to report wages using the smartphone application,
 - o Page 5 – added Wage Reporting Reminder and web link, and
 - o Page 6 – updated the OMB expiration date.
- **Minor Language Changes to SSIMWR Screen Shots**
 We will make minor language revisions to the mobile screen shots to help the reporter to better understand and use our application. For example, on the screen where the user chooses who they are reporting for, it said "I am reporting wages for" and we want to change it to "I am reporting wages earned by." Another example would be on the screen where the user enters their wages, the title of the screen said "Enter Wages" and we want to change it to "Enter Your Wages."

SSIMWR National Rollout- Access Code Removal and Update App Store Description

On August 30, 2012, OMB approved SSA’s implementation for piloting the SSIMWR smartphone application. SSA is requesting to move forward with the National implementation on August 1, 2013 to include all SSA field offices to recruit wage reporters.

- **Access Code Removal**
 We created the SSIMWR access code to control access to the SSIMWR application during the pilot phase; removing the access code will allow easier and less frustrating use for reporters who found it hard to remember the access code to report wages.
- **Description of the App Store**
 Before a reporter downloads the SSIMWR application, they can read the description in the Apple iTunes and Google play stores. The description provides the user with general information about the free SSIMWR application and explains that it will help them better understand the application. We revised the existing description to remove reference to the access code. We did not add new language to the description.

Burden Information

At this time, we do not expect the GK enhancement or the recruitment process to increase the overall public burden attributable to this information collection. While we expect the expansion of wage reporting to the entire month will result in more wage reports, we do not expect the overall public burden to increase nor do we expect to exceed the estimated 85,000 respondents.