**Justification for the Non-Substantive Changes for
Social Security Administration's Request for Internet Services & 800# Automated
Telephone Services (RISA) Knowledge-Based Authentication
20 CFR 401.45
OMB No. 0960-0596**

Background

The Social Security Administration (SSA) discontinued the Knowledge-Based Authentication (KBA) version of the automated telephone Change of Address application on July 27, 2013. We are currently automatically routing responders who attempt to access the automated telephone application to report a change of address to the next available telephone agent for assistance. We are only discontinuing this telephone option temporarily; however, we realize that removing it from the automated telephone system prior to obtaining OMB approval is a violation of the PRA. Please see Change #1 below for more information.

In addition to the above change to the automated telephone services, SSA will also discontinue offering Knowledge-Based Authentication (KBA) access to the following internet applications: Internet Medicare Replacement Card (iMRC) and Internet Replacement 1099/1042S (i1099). We plan to move these applications behind the Public Credentialing and Authentication Process, OMB No. 0960-0789 (hereafter called "electronic access to MySocialSecurity") effective in late October, 2013. Using the electronic access registration process, customers can create an account, obtain a credential, and access our online services through a new Internet portal, the *my*SocialSecurity website. The KBA-accessed Automated Telephone versions of these applications will continue to remain available.

These changes will reduce the annual number of respondents to the information collection.

Revisions to the Collection Instrument

- **Change #1:** We temporarily removed the National 800 Number Network Change of Address Automated Telephone application on July 27, 2013, and, as this removal is only temporary, we are reducing the burden to a one-hour placeholder.

  Justification #1: We are taking this application temporarily down due to our effort to strengthen and secure our online and automated telephone services (as discussed in our Addendum, approved on 9/28/12). Responders will be able to request a change of address using our other service channels.

We understand that making this change prior to obtaining OMB approval is a violation of the PRA, and will report this violation as part of the next ICB.

- **Change #2:** We will discontinue offering KBA access to the iMRC and i1099 applications.

  Justification #2: We are removing iMRC and i1099 from Internet KBA access and moving them behind the Internet MySocialSecurity portal in late October 2013.

  Effective in October 2013, individuals will begin accessing these applications using our new registration and authentication process (covered under OMB No. 0960-0789) via the Internet. The KBA-accessed Automated Telephone versions of these applications will continue to remain available. As we obtain OMB approval for the Internet version of the Replacement 1099 under OMB Clearance # 0960-0583, we are not counting the respondents in this collection. However, we mention it here, as we will cover the authentication questions under 0960-0789 instead of 0960-0596 as of October 2013.

Estimates of Public Reporting Burden

We are adjusting the reporting burden to reflect the removal of the Internet version of the Medicare Replacement Card application from this information collection. This change will reduce the annual number of respondents to this information collection. We are also adjusting the reporting burden to reflect the removal of the automated telephone Change of Address application from this information collection.

As we mentioned above, OMB # 0960-0583 covers the Internet version of the Replacement 1099; therefore, we are not counting those respondents in this collection.

Revised Burden Chart

Modality of Collection	Number of Respondents	Frequency of Response	Average Burden Per Response (minutes)	Estimated Annual Burden (hours)
Internet Requestors	7,650,047	1	2.5	318,752
Telephone Requestors	5,426,542	1	4.5	406,991
Change of Address (on hold)	1			1
*Screen Splash (on hold)	1			1
Totals	**13,076,591**			**725,745**

*We previously reduced the burden to a one-hour placeholder for Screen Splash (see OMB approved Change Request from 8/1/11.

The total burden for this ICR is now 725,745 hours. This figure represents burden hours, and we did not calculate a separate cost burden.