

Addendum to the Supporting Statement for Form SSA-561-U2
Request for Reconsideration
20 CFR 404.907-404.921, 416.1407-416.1421, and 418.1325
OMB No. 0960-0622

Revisions to the Collection Instruments

To improve the quality of service we provide the public, we are updating the SSA-561 (paper form) and the i561 (electronic form) which is housed in the iAppeals application along with the i501 (Request for Hearing By Administrative Law Judge; OMB # 0960-0269), and the i3441 (Disability Report; OMB # 0960-0144).

We are making similar revisions to both 0960-0269 as we are to 0960-0622. We are including a seamless Internet process for the iAppeals applications (i501 and i561) which will allow the iAppeals respondent to complete an appeals application followed directly by the i3441, Disability Report with no break or change in look or feel for the respondent. This will replace the need for the respondent to return to the main menu to select the Disability Report (i3441) after completion of the appeals application. To accommodate this seamless approach, we are omitting questions not used to process reconsideration requests, and simplifying the language on both the paper and electronic forms.

Revisions to the i561 Screens:

- **Change #1:** Collection of contact information from all third parties

Justification #1: Though iAppeals collects contact information from claimants and representatives (third parties), it does not collect relationship and contact information from all third parties. Therefore, we are updating iAppeals so it will collect relationship and contact information from all third parties. Prior to this update, if third parties were completing the appeal request (i.e., someone other than the claimant or claimant's representative); the system required them to indicate they were the claimant. Collecting relationship and contact information from all third parties will provide us with information about who (relatives, friends, clergymen, social services, etc.) accesses iAppeals to assist claimants with appeal requests.

- **Change #2:** Propagation of information between screens

Justification #2: We are updating iAppeals to allow information to propagate from screen to screen as appropriate. For example, on the i561, we will collect contact information for both third parties (form completers) and representatives. If the third parties and representatives are the same people, they will not need to key the contact information twice because the contact information will propagate from the third party screen to the representative screen. Propagation of information will promote accuracy of the information iAppeals collects and reduce the need to re-key information.

- **Change #3:** Single submission of the i561 and i3441

Justification #3: We are updating the process for submitting an appeal online. Prior to this update, a claimant or third party could submit the i561 and i3441 separately. Often, this process led to the failure to collect required information and the need to contact the claimant. We are updating iAppeals so a claimant or third party will submit the i561 and i3441 at the same time. This process will ensure we receive a complete appeal package that includes the required information. We are making this a seamless process, so the iAppeals user will progress directly from the i561 to the i3441 questions, with no break or need to revisit the main page.

- **Change #4:** Receipt of Appeals from foreign addresses

Justification #4: We are updating iAppeals so that it will accept appeals with a foreign address.

- **Change #5:** Rename and reconfigure the layout of, and simplify the language on, the “Getting Ready” Welcome screen.

Justification #5: We are renaming the screen to read both “Disability Appeal” and “Getting Ready,” as well as reconfiguring the layout of, and simplifying the language on the Welcome Page so that iAppeals will be more user friendly.

- **Change #6:** Moved the link to the Privacy Act Statement to the Welcome Page.

Justification #6: We are moving the Privacy Act link to inform the individual of how we use the collected information to process and appeal. The link is currently located on the “Request for Hearing by an Administrative Law Judge” and “Request for Reconsideration” screens.

- **Change #7:** Delete the “Can you use this online disability appeal?” screen.

Justification #7: iAppeals does not currently accept appeals from foreign addresses. We are updating iAppeals so that it will accept appeals from foreign address, which includes removing this screen.

- **Change #8:** Rename the “Claimant Information” screen to “Information About the Applicant” screen.

Justification #8: We are renaming the screen so that it will provide a better description of the information we need entered onto the screen.

- **Change #9:** Add the “Who is entering this appeal?” screen.

- **Justification #9:** We are adding this screen because we will collect information from all third parties who file an appeal on an applicant’s behalf.

- **Change #10:** Delete the Residence/Territory question from the “Information About the Applicant” screen (formerly “Claimant Information” screen).

Justification #10: We will no longer need this question to determine whether an applicant lives in a prototype state. We will use the applicant’s residence address information to make the prototype state determination.

- **Change #11:** Replace the “Print Your Reentry Number and Receipt” screen with the “Reentry Number” screen.

Justification #11: We are updating the screen name to incorporate the option of receiving the reentry number by email.

- **Change #12:** Rename the “Welcome Back” screen to “Return to a Saved Appeal” screen.

Justification #12: Currently, respondents receive a reentry number upon completion and submission of the i561 only. We are updating iAppeals for the single submission process which will mean the respondents must complete and submit the i561 and i3441 together. Therefore, we will provide a reentry number once respondents provide their personal identifying information and decision notice date. Respondents will need to complete and submit the appeals request (i561 and i3441) during the session, or return to iAppeals, use the reentry number, and complete and submit the i561 and i3441 in a subsequent session.

- **Change #13:** Add the “Please Confirm Your Identity” screen.

Justification #13: We are adding this screen to confirm the identity of the person returning to iAppeals to complete and submit an appeal on an applicant’s behalf. If necessary, we will also capture third party contact information.

- **Change #14:** Add the Information about Third Party screen.

Justification #14: We are capturing this information so we will know whether applicants have people assisting them with the appeal.

- **Change #15:** Add the Information about Third Party (professional representative) screen.

Justification #15: We will collect contact information about an attorney or non-attorney who represents the claimant before the agency. As appropriate, we will use this information to contact the attorney or non-attorney.

- **Change #16:** We are adding the “Representative for the Applicant” screen.

Justification #16: We will use this screen to ask whether the applicants have a representative, and to collect the representative’s contact information.

- **Change #17:** Revise the “Request for Reconsideration” screen for 3rd party and 1st party.

Justification #17: We will continue to collect the reason for which an applicant is appealing a determination on this screen; however, we will include both 1st and 3rd party questions.

- **Change #18:** Rename the “Review and submit your Request for Reconsideration” screen to “Overall Summary” screen.

Justification #18: We will continue to provide an applicant or a third party with the opportunity to review and edit information provided on the appeal request before submission of the request. The only change is to the screen name for clarity.

- **Change #19:** Rename the “Print your Reentry Number and Receipt” screen to “Disability Appeal (Confirmation)” screen.

Justification #19: We revised this screen to let an applicant or third party know whether appeal was successfully submitted through this screen. This screen will also allow the applicant or third party to print the receipt for the submitted appeal request.

Revisions to the SSA-561:

- **Change #1:** We will remove the following fields: NAME OF WAGE EARNER OR SELF-EMPLOYED PERSON; SUPPLEMENTAL SECURITY INCOME (SSI) OR SPECIAL VETERANS BENEFITS (SVB) CLAIM NUMBER; SPOUSE’S NAME AND SPOUSE’S SOCIAL SECURITY NUMBER.

Justification #1: We are removing these fields because we do not use them to process appeals. In addition, removing these fields will make the paper form consistent with the electronic form (i561), as these fields do not appear in the i561 screens.

- **Change #2:** We will revise the “CLAIM FOR” field to read “ISSUE BEING APPEALED.”

Justification #2: The existing language implies we only use the form for a claim. The appeal is for not only an initial claim but also a post-entitlement issue. The revised language gives the reader the option to provide a specific reason for the appeal such as income, overpayment, etc.

- **Change #3:** We will revise the field, “I do not agree with the determination made on the above claim and request reconsideration. My reasons are:” to read, “I do not agree with the Social Security Administration’s (SSA) determination and request reconsideration. My reasons are:”

Justification #3: The existing language implies we only use the form for a claim. The appeal is for not only an initial claim but also a post-entitlement issue.

- **Change #4:** We enlarged the section, “SUPPLEMENTAL SECURITY INCOME OR SPECIAL VETERANS BENEFITS RECONSIDERATION ONLY” and will add the explanations for each type of appeal from the last page.

Justification #4: We enlarged this section to make the information stand out so that the respondents appealing an SSI or SVB issue can clearly see their options. Our updating of this section will allow the respondents to choose the appropriate type of appeal without having to turn to another page for an explanation.

- **Change #5:** We will revise the heading, “ENTER ADDRESSES FOR THE CLAIMANT AND REPRESENTATIVE” to read “CONTACT INFORMATION.”

Justification #5: The revised heading separates the SSI and SVB information section from the Contact Information section.

- **Change #6:** We will add “IF ANY,” to the “NAME OF CLAIMANT’S REPRESENTATIVE” section.

Justification #6: The revision informs the reader that a representative is not required.

- **Change #7:** We will move the “See list of initial determinations” and include them in the question 1 section.

Justification #7: The information in the statement and the question sections relate to one another.

- **Change #8:** We will delete question 2, “Claimant Insists On Filing.”

Justification #8: Question 2 is not relevant to the reconsideration. The respondent has the right to file an appeal and does not need to insist on filing.

- **Change #9:** We will renumber question “3” to “2,” move the new question 2 to the same section as question 1, and remove some language from this section.

Justification #9: We will reformat the questions since we will delete question 2. We will remove the reference to our Program Operations Manual System (POMS) section GN 03102.125 since this section applies to all situations when there is not a timely appeal filed. This POMS section provides instructions to technicians for handling appeals that are not timely filed.

- **Change #10:** We will add the heading, “Field Office Development (GN 03102.300)” in the section that contains the development questions and will relocate this section on the form.

Justification #10: The current placement of the POMS section implies it belongs just to the language that begins with, “No further...” when it actually covers the entire development section.

- **Change #11:** We will add a new section that contains information about Goldberg Kelly (GK) that applies to SSI cases only.

Justification #11: The intention of this new section is to increase awareness of the GK policy.

- **Change #12:** We will combine the “Social Security Office Address” and the “Do not write in this space” sections. We will rename this section from “Do not write in this space” to “Date Appeal Received.”

Justification #12: Updating of this section will allow the technician to complete both fields at one time.

- **Change #13:** We will move information from the last page titled “HOW TO APPEAL YOUR SUPPLEMENTAL SECURITY INCOME (SSI) OR SPECIAL VETERANS BENEFIT (SVB) DECISION,” and will place the information in the section titled “SUPPLEMENTAL SECURITY INCOME OR SPECIAL VETERANS BENEFITS RECONSIDERATION ONLY.”

Justification #13: We moved the majority of the information from the last page to a different section. By moving this information, the respondent can choose the appropriate type of appeal without having to turn another page for an explanation. Rather, the type of appeal and explanation of each appeal will be in one section.

- **Change #14:** We will remove the Routing Instructions at the bottom of the form.

Justification #14: Our removing of this information allows technicians to use a variety of electronic methods to transfer a reconsideration appeal. For the few paper reconsiderations that exist, the technician will likely use a Route Slip (SSA-408) to transfer the appeal.

New iAppeals Attachment Utility Function:

The new Attachment Utility function will be a part of the iAppeals application allowing users to attach and submit documents, such as medical records, supporting a claimant’s appeal (see included screenshots). We expect the Attachment Utility option will decrease the need for applicants to fax, mail, or hand-carry paper documents into SSA field offices (FO). The purpose of the Attachment Utility is to create an electronic document submission process.

The iAppeals Attachment Utility will enable:

- Internet users to quickly and easily upload files associated with their claim from their computer to the iAppeals application;
- Social Security Administration (SSA) staff users to:
 - Identify iAppeals that have uploaded documents;
 - Retrieve and view documents electronically;
 - Delete files when they are deemed to be unnecessary;
 - Delete, print, and send documents to the electronic folder for retention;

- o Collect Management Information (MI) for usage, demographics, and failures from the internet application and the internal document processing tool.

The above iAppeals Attachment Utility improvements are consistent with our agency's strategic goal to provide quality services, and improve the speed and quality of our disability process.

SSA currently receives approximately 90,000 iAppeals per month, and attorney and non-attorney representatives complete about 65-75% of them. Since we recently implemented a policy requiring mandatory iAppeals usage for representatives seeking direct pay, we want to make it easy and convenient for them to attach supporting documents, and for the FO staff to open, review, and include the supporting documents in the appropriate electronic retention file. Within one year after release, our goal is for 50% of iAppeals filed by representatives to include attached documents.

We expect this new process will reduce time for FO mail processing, re-contacts, and the need for faxing documents into the electronic folder. We also believe additional savings could come from reductions in material costs associated with printing, faxing, and shredding of paper documents.

This release will allow claimants or their representatives to upload documents directly to the Social Security Administration (SSA), eliminating the need to submit the documents by mail or fax. This will save the users time and expense, while taking away a large workload for FO employees. Since the new Attachment Utility will streamline the current process, we do not anticipate any change in the current burden for iAppeals.

We are making the following changes to the iAppeals Screens (i501, i561, and i3441) to accommodate the new Attachment Utility function:

- **Change #1:** We are replacing the "Submit" button with "Next" button on the "Overall Summary" screen (previously the "Review and Submit Your Request for Reconsideration" screen).

Justification #1: The next button will take respondents to the "Attach Files" screen.

- **Change #2:** We are adding the "Attach Files" screen

Justification #2: This screen will allow respondents to add and submit files (evidence and other documents), along with an appeal request, through iAppeals. This option will eliminate the need to mail or hand carry documents into a field office.

- **Change #3:** We are adding information about attachments to the "Disability Appeal (Confirmation)" screen (previously the "Print Your Reentry Number and Receipt" screen).

Justification #3: We will let an applicant or third party know whether the appeal and attachments were successfully submitted.

SSA will implement all the above changes upon OMB's approval of this information collection request, with the exception of the new Attachment Utility function which we intend to implement in 2015.