

Supporting Statement for Forms SS-5, SS-5-FS
Application for a Social Security Number (SSN) Card, the Social Security Number
Application Process (SSNAP) and the Internet SSN Replacement Card (iSSNRC)
Application
20 CFR 422.103 - 422.110
OMB No. 0960-0066

A. Justification

1. Introduction/Authoring Laws and Regulations

Section 205(c)(2)(B) of the *Social Security Act* and section 20 *CFR 422.103-422.110* of the *Code of Federal Regulations (CFR)* authorize the Social Security Administration (SSA) to assign Social Security numbers (SSNs) and issue SSN cards for those numbers. Section 20 *CFR 422.107* discusses the evidentiary and interview requirements for obtaining an SSN. 20 *CFR 422.103* specifies that an individual may apply for a new or replacement SSN by completing a Social Security Administration (SSA)-approved application designed for this purpose. Section 20 *CFR 422.103(e)(2)* places annual and lifetime limits on the number of replacement SSN cards SSN holders may receive (no more than three in a year and 10 per lifetime).

Additionally, on February 26, 2015, OMB published the Social Security Administration's Notice of Proposed Rulemaking (NPRM) announcing the revision of our regulations to allow certain applicants for a Social Security number (SSN) replacement card to apply by completing a prescribed internet application, Internet Social Security Number Replacement Card (iSSNRC), and submitting the required evidence online rather than completing a paper Form SS-5, Application for a Social Security Card (80 FR 10432).

SSA plans to begin rolling out the iSSNRC application, in a handful of states, in early FY 2016. Effective with the implementation of iSSNRC, adult U.S. citizen applicants will be able to complete an online request for a no-change replacement card for this purpose (see Addendum for more information).

2. Description of Collection

SSA collects information on the SS-5 (used in the United States) and SS-5-FS (used outside the United States) to issue original or replacement Social Security cards. SSA also enters the application data into the Social Security Number Application Process (SSNAP) when applicants request a new or replacement card in person. Applicants who visit an SSA field office (FO) can complete their application in an interview situation without completing a paper form SS-5 or SS-5-FS. As per section 20 *CFR 422.110* of the *Code of Federal Regulations*, members of the public may also file one of these applications to request a change in their SSN records. In addition, hospitals

also collect the same information for SSA from newborn children through the Enumeration-at-Birth (EAB) process. Through EAB, parents of newborns provide hospital birth-registration clerks with information required to register the newborns. Hospitals send this information to State Bureaus of Vital Statistics (BVSs), and the BVSs send the information to SSA's National Computer Center. SSA then uploads the data to the SSA mainframe along with all other enumeration data, and we assign the newborn a Social Security Number and issue a Social Security card.

Additionally, the new iSSNRC application will collect information similar to the paper SS-5 for no-change replacement SSN cards for adult U.S. citizens. The iSSNRC modality will allow certain applicants for a Social Security number (SSN) replacement card to apply by completing a prescribed internet application and submitting the required evidence online rather than completing a paper Form SS-5, Application for a Social Security Card.

The respondents are applicants for original and replacement Social Security cards, or current number holders who request a change in their SSN records.

3. Use of Information Technology to Collect the Information

Through iSSNRC, SSA will offer the option of completing an online request for adult U.S. citizen applicants. Adult U.S. citizens who are not reporting any changes to their record (e.g., name or date of birth), would have the option to file for an SSN replacement card online after registering through the *my Social Security* portal. Eligible individuals would also be required to have a domestic U.S. address (including Air/Army Post Office or Fleet Post Office mailing address) and a valid State-issued driver's license (DL) or State identification (ID) card.

Currently, applicants can avoid completing a paper form SS-5 by visiting an SSA field office, and providing their information during an interview while an SSA employee enters the information into the electronic SSNAP system. We estimate approximately 90 percent of applicants visit an SSA field office, or call SSA, to file their application using SSNAP, while only approximately 10 percent complete the paper versions of the forms and mail them to an office for processing.

4. Why We Cannot Use Duplicate Information

The nature of the information we are collecting and the manner in which we collect it preclude duplication. SSA does not use another collection instrument to obtain similar data.

5. Minimizing Burden on Small Respondents

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

6. **Consequence of Not Collecting Information or Collecting it Less Frequently**
If SSA did not conduct this information collection, the public would have no way to apply for SSNs and SSN replacement cards. Since the public needs SSNs to maintain earnings records, apply for jobs, file tax returns, open accounts at financial institutions, etc., not having an SSN or SSN card would be a great disadvantage. Since we only collect the information when an applicant needs an original or replacement SSN card, 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 collect this information 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 April 30, 2015, at 80 FR 24307, and we received no public comments. SSA published the second Notice on June 29, 2015, at 80 FR 37033. 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 payment or gifts to the respondents.
10. **Assurances of Confidentiality**
SSA protects and holds confidential the information it collects 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.
11. **Justification for Sensitive Questions**
The information collection does not contain any questions of a sensitive nature.
12. **Estimates of Public Reporting Burden**
Below are annual burden data for the different types of SSNAP/SS-5/SS-5-FS applicants. Since the questions are identical (only the instructions are different), we combined the burden data for all application scenarios. Each of the below categories includes both the paper and electronic versions of this collection with the exception of the cover letters, because we only maintain paper versions of the cover letters, and the new iSSNRC screens, as it takes less time to complete them.

As we stated in #3 above, approximately 90 percent of all respondents use the electronic SSNAP system rather than using the paper versions of the form; however, it takes the same amount of time to fill out the paper versions as it does for the SSNAP

system interview process. Beginning in early FY 2016 SSA will roll out the iSSNRC modality in a handful of states which will allow adult U.S. citizen applicants for a no-change replacement SSN card to apply by completing a prescribed internet application and submitting the required evidence online rather than completing a paper Form SS-5, Application for a Social Security Card. We anticipate a decrease in the number of respondents applying for replacement cards at SSA field offices and the resulting decrease in annual burden hours is reflected in the chart below.

Application Scenario	Number of Respondents	Frequency of Response	Average Burden Per Response (minutes)	Estimated Total Annual Burden (hours)
Respondents who do not have to provide parents' SSNs	10,500,000	1	8.5	1,487,500
*Adult U.S. Citizens requesting a replacement card with no changes through new iSSNRC modality	1,500,000	1	5	125,000
Respondents whom we ask to provide parents' SSNs (when applying for original SSN cards for children under age 18)	400,000	1	9	60,000
Applicants age 12 or older who need to answer additional questions so SSA can determine whether we previously assigned an SSN	1,500,000	1	9.5	237,500
Applicants asking for a replacement SSN card beyond the new allowable limits (i.e., who	900	1	60	900

must provide additional documentation to accompany the application)				
Authorization to SSA to obtain personal information cover letter	500	1	15	125
Authorization to SSA to obtain personal information follow-up cover letter	500	1	15	125
Totals	13,901,900			1,911,150

*The total timeline for complete national coverage of the iSSNRC application is two years from the date of initial implementation and is dependent on the contractor enrolling each State into the network. By FY 2018, we would expect to issue about 1.5 million replacement cards annually via the iSSNRC application. However, the estimated volume could vary based on the date of implementation, when the contractor acquires States, and our marketing efforts to the public.

The total annual burden is **1,911,150** hours. This figure represents burden hours, and we calculated a separate cost burden for the EAB process, as shown in #13 below.

13. Annual Cost to the Respondents (Other)

Under the Enumeration at Birth (EAB) process, the State BVSs incur costs for participating in EAB. The State BVSs incur a total cost of approximately \$11 million for transmitting data to SSA’s mainframe. Please note the States receive reimbursement for these costs.

14. Annual Cost To Federal Government

The annual cost to the Federal Government for these collections is approximately \$403 million. This cost is an estimate of the SSN issuance process, including printing and distribution costs, the costs of processing the forms, and the cost to complete the applications.

In addition, we will incur a one-time cost to develop and implement the iSSNRC application. We estimate the one-time cost of approximately \$13 million in FY 2015 for systems start-up, IT, infrastructure, and contract costs. Once this project is fully implemented, we expect to realize offsetting savings in our field offices due to the partial redirection of the SSN replacement card issuance workload to online services.

15. Program Changes or Adjustments to the Information Collection Request

The decrease in the burden is due to an anticipated decrease in the number of respondents applying for replacement cards at SSA offices and instead availing themselves of the iSSNRC process which we estimate will have a lower average burden of response as reflected in #12 above. See more information regarding iSSNRC in the Addendum.

16. Plans for Publication Information Collection Results

SSA will not publish the results of the information collection.

17. Displaying the OMB Approval Expiration Date

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 the iSSNRC online application or Form SS-5; SS-5 FS.

18. Exceptions 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. Collections of Information Employing Statistical Methods

SSA does not use statistical methods for this information collection.