Addendum for Non-Substantive Changes 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

Background

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 and submitting the required evidence online rather than completing a paper Form SS-5, Application for a Social Security Card (80 FR 10432). This proposed change will provide flexibility in the ways in which the public may request SSN replacement cards and allow us to implement an online SSN replacement card application system. We anticipate that, as a result of the implementation of the iSSNRC modality, we will experience a net decrease in the estimated total annual burden hours on the public as indicated in #12 of the associated Supporting Statement.

Revision to the Collection Instrument

• <u>Change #1</u>: We will allow some members of the public to apply for replacement SSN cards electronically without having to visit our offices in person, or mail in the application and supporting evidence.

Justification #1: Currently, individuals can apply for an SSN by completing Form SS-5 and submitting it, in person or via mail, to their local field office (FO) or a Social Security Card Center, or through an in-office interview while one of our representatives files an application electronically through the Social Security Number Application Process (SSNAP). The applicants must also present, or mail in, supporting documentary evidence.

During the iSSNRC application process, we will securely collect and verify required information electronically (for example, identifying information, or the mailing address associated with the individual requesting the card), and analyze each request for potential fraud. Moving this service online will allow customers to complete a request at any time, without the need to visit us in person. It will also help the public by allowing our employees to focus more on other vital services, such as taking claims for benefits and conducting program integrity work.

The proposed regulatory changes will ensure our SSN regulations support the development of this online application. Under the new iSSNRC modality, adult U.S. citizens who are not reporting any changes to their record (e.g., name or date of birth), will have the option to file for an SSN replacement card online after registering through the *my* Social Security portal.

iSSNRC has three main sections of messaging and data collection. First, before we offer the application to the user, it checks internal SSA records to ensure eligibility, such as being a U.S. Citizen age 18 or over, no other pending SSN applications, and annual/lifetime card limits. Next, the first screen within the application asks several self-screening questions to further determine if the user will be successful in the request and offers alternative service channels if not. Finally, the main data collection page gathers specific information (such as the full name, SSN, Driver's License/State ID data, and address) and performs a real time verification of the information against our own records, the State issuing their ID, and possibly other external records to verify their mailing address is associated with them. If iSSNRC verifies all data successfully, then we accept the replacement card application, screen it for suspected fraud, and issue the card if we find no fraud.

• Change #2: SSA secured the services of a contractor (American Association of Motor Vehicle Administrators or "AAMVA") to provide real-time verification services for the iSSNRC application. SSA will collect driver's license (DL) or State identification (State ID) data in the iSSNRC application. The iSSNRC application will electronically transfer these data elements to the contractor. The contractor will return a real-time verification, matching the data received from the iSSNRC application and the data received directly from the custodian of the record. The contractor will return an immediate "match or no match" response to SSA for each data element. Based on the response, SSA will determine whether the DL or State ID card meets our requirements as evidence of the individual's identity.

<u>Justification #2:</u> Leveraging AAMVA's existing date-sharing capabilities, existing relationships with the states, and technological expertise allows SSA to implement and effectuate the iSSNRC application in the most efficient, cost-effective manner.

Intended Implementation Date: By the end of calendar year 2015, we will begin releasing the new iSSNRC modality via a gradual, state-by-state rollout.