**Justification for the Non-Substantive Changes for**

**Social Security Administration’s Public Credentialing and Authentication Process**

 **20 CFR 401.45, 20 CFR 402**

**OMB Control Number: 0960-0789**

**Background**

Since we established it in May of 2012, SSA uses the Social Security Administration’s Public Credentialing and Authentication Process (hereafter called “electronic access”) to provide a secure, centralized gateway to Social Security’s public-facing electronic services. In an effort to meet the Agency’s strategic goal to deliver innovative, quality services, we will place several applications behind the electronic access system (*my* Social Security).

The Contractor Access to eFolders application uses the electronic access system (*my* Social Security) for registration and authentication of its users. Once the users sign in through the electronic access system, the system leads them out to another portal to access the application. This application allowed the expansion of online services to contracted third parties (Medical and Vocational Experts). These experts can now review and download case documentation stored in the electronic folder (eFolder) for the claimant. We implemented this application on April 30, 2016.

We are modifying the Internet Application Status (iAPS) application to better support applicants needs when requesting the status of their initial benefit application online. iAPS is also migrating behind the electronic access system (*my* Social Security). This application will provide a secure service delivery channel that will allow the Agency to provide detailed status information without requiring a confirmation number. In doing so, the application will now go by the new name of myAPS to be consistent with all *my* Social Security application names.

**Revisions to the Collection Instrument**

* **Change #1:** The Contractor Access to eFolders application uses the electronic access system (*my* Social Security) for registration and authentication of its users.

**Justification #1:** In using the electronic access system for registration and authentication, the Contractor Access to eFolder application can provide a more secure service delivery channel for our third party contractors.

* **Change #2:** We will place the Internet Application Status (iAPS) application behind the *my* Social Security electronic access portal, and will rename it myAPS.

**Justification #2:** We are placing iAPS/myAPS behind the electronic access portal to provide a more secure service delivery channel for our customers.

**Estimates of Public Reporting Burden**

We are adjusting the reporting burden to this information collection, because we expect additional customers to register and access the website for the additional services we will offer. We also expect the number of respondents or burden hours we reported in our existing burden estimate to change. OMB approved the current burden estimate on 3/25/16.

We estimate that 46,140,116 respondents will use the Internet process annually to create and manage an account with SSA and then authenticate to gain access to our secured online services. We estimate that it takes an average of 8 minutes to complete a transaction, resulting in an annual reporting burden of 6,152,015 hours.

We estimate that 2,444,557 respondents will use the Intranet process annually to create and manage an account with us. We estimate that it takes an average of 8 minutes to complete this transaction, resulting in an annual reporting burden of 325,941 hours.

We use different modalities to collect the information, via the Internet and the Intranet. We included an estimated number of registrations and sign-ins when we calculated the total number of annual respondents. Taking data from each application sponsor, we estimated that an additional 501,500 registrations would register due to the additional services we will offer. We estimated the number of minutes for completion by averaging the “time-on-task” figures we obtained from our usability testing.

See chart below with the updated figures:

|  |  |  |  |  |
| --- | --- | --- | --- | --- |
| **Modality of Completion** | **Number of Respondents** | **Frequency of Response** | **Average Burden Per Response (minutes)** | **Total Annual Burden Hours (hours)** |
| Internet Respondents | 46,140,116 | 1 | 8 | 6,152,015 |
| Intranet Respondents | 2,444,557 | 1 | 8 | 325,941 |
| Totals: | 48,584,673 |  |  | 6,477,956 |

The total annual burden for this information collection is **6,477,956** hours.