Supporting Statement for Social Security Benefits Applications:
Form SSA-1: Application for Retirement Insurance Benefits
Form SSA-2: Application for Wife's or Husband's Insurance Benefits
Form SSA-16: Application for Disability Insurance Benefits
Internet Claim (iClaim) Application Screens
Internet Appointment (iAppointment) Application Screens
20 CFR 404.310-404.311, 404.315-404.322, 404.330-404.333, 404.601-404.603, and 404.1501-404.1512
OMB No. 0960-0618

A. Justification

1. **Introduction/Authoring Laws and Regulations**
   The Social Security Administration (SSA) provides Retirement, Wife's or Husband's, and Disability Insurance benefits to members of the public who meet the required eligibility criteria and file the correct application. Sections *202(a)-(c)* and *223 (a)* of the *Social Security Act (Act)* and Sections *20 CFR 404.310-404.311, 404.315-404.322, 404.330-404.333, 404.601-404.603,* and *404.1501-404.1512* of the *Code of Federal Regulations* explain entitlement criteria for each benefit and application requirements.

   For qualifying beneficiaries, an application for Title II cash payments is also an application for Title XVIII Hospital Insurance (HI) (as per *Section 226* of the *Act*), and by extension automatic enrollment in Supplemental Medical Insurance (SMI) as well (*Sections 1831* and *1836* of the *Act).* Individuals can choose to restrict their applications to HI/SMI, i.e. Medicare, but defer cash benefits until a later date. This includes those who meet the age requirements for HI/SMI/Medicare benefits but continue to work, and want to enroll in Medicare but defer Title II retirement benefits. Accordingly, SSA refers to such situations as "Medicare-only" applications.

2. **Description of Collection**
   SSA uses the information gathered by each benefit application to determine eligibility for Social Security benefits and the amount of the benefits. Collection of this information is mandatory for SSA to award or deny retirement, wife's or husband's, and disability benefits. The public can apply for the appropriate benefit type using one of three modalities: 1) a paper application (form SSA-1, SSA-2, or SSA-16); 2) a field office interview, during which SSA employees enter applicant data directly into the Modernized Claims System (MCS); or 3) using an online system (iClaim). Third-party representatives of applicants can use any of these modalities to apply for the applicants they represent. The following is a list and description of each modality SSA uses to collect information for these benefit applications.

   Paper Application Forms:
   SSA-1 – Application for Retirement Insurance Benefits: SSA uses Form SSA-1 to determine individuals' entitlement to retirement insurance benefits. When individuals

file for Medicare-only with the SSA-1 paper application, we rename the SSA-1 to "Application for Hospital Insurance" with pen-and-ink changes, and collect information we require for an individual to enroll in hospital (Medicare Part A) and medical (Medicare Part B) insurance.

<u>SSA-2</u> – Application for Wife's or Husband's Insurance Benefits: SSA uses Form SSA-2 to determine individuals' entitlement to spouses' or divorced spouses' insurance benefits.

<u>SSA-16</u> – Application for Disability Insurance Benefits: SSA uses Form SSA-16 to determine individuals' entitlement to Disability Insurance benefits under Title II of the *Act.*

SSA no longer prints and delivers paper copies of these forms to field offices since printable and fillable versions are available on our website.

Interview/MCS Screens:
MCS mirrors the retirement, wife's and husband's, and disability paper application formats using an electronic collection method. For Medicare only claims, the SSA representative uses an abbreviated version of MCS's retirement application. Guided by the MCS collection screens, an SSA representative interviews the applicant either by phone or in person and inputs the information directly into SSA's application database. MCS prompts the representative with the required questions based on the type of application the applicant files, and the applicant's initial responses. MCS also propagates information to other screens in the application. MCS prints an application summary for the claimant to review and sign by either attestation or wet signature. In contrast to the paper application, the interview/MCS process offers the following advantages: 1) it improves accuracy in recording responses, 2) it reduces the overall interview time, and 3) it reduces the number of times we have to re-contact applicants to clarify responses.

Internet Claim (iClaim) Application:
iClaim is an online platform that mirrors the MCS format. The public can use iClaim to apply for retirement and disability insurance benefits. Depending on their initial answers, iClaim presents applicants with different screens, ensuring they only respond to relevant questions. When filing for retirement benefits, iClaim provides the option to use the retirement application as an application for wife's or husband's benefits or Medicare only. After completing the online application, claimants or their third-party representatives can submit it electronically to SSA, avoiding the need to visit an SSA office. iClaim is more convenient for users and reduces their application completion time by eliminating the need for an office visit. This also saves time and resources for SSA.

There are two ways to complete and submit iClaim. **First-party iClaim respondents** are individuals (claimants) who complete; electronically sign; and submit the entire

application online on their own behalf. They may have to submit supplementary supporting documents (e.g., medical evidence for disability benefits applications) to finalize the application. **Third-party iClaim respondents** are individuals who complete and submit an online claim for a claimant. A third-party iClaim respondent cannot electronically sign the online application for the claimant. After third-party respondents submit an online claim, SSA sends an application summary directly to the claimants. The claimants must review, correct, and initial if necessary, and sign the application summary confirming the information and their intent to file for benefits and submit it to SSA. Once SSA receives the application summary, and any supplemental information if necessary, we process the application.

Internet Appointment (iAppointment) Application:

iAppointment is an online process that allows members of the public an easy-to-use method to schedule an appointment with the servicing office of their choice. Since the application date can affect when a claimant's benefit begins, iAppointment establishes a protective filing date and provides respondents information related to the date by which they must file their actual application.

We offer iAppointment to individuals who either attempt to establish an iClaim application but are unable because they failed the initial verification checks, or who start iClaim but state their reading language preference is other than English.

The iAppointment application propagates information the applicant already entered into iClaim for SSN, name, date of birth, and gender. However, applicants must provide minimal additional information: mailing address; telephone number; language preference; type of appointment (Disability, Retirement, Medicare); and whether they prefer a telephone interview or in-office appointment. iAppointment is a customer-centric application.

If the available appointment times do not meet the customer's needs, iAppointment allows them to enter a different zip code to identify another field office, which may offer different appointment times. At this time, SSA only allows domestic first party applicants, or third parties applying for individuals who are sitting with them, to use iAppointment. If users indicate they are filing as third parties, iAppointment provides a message directing them to call the National 800 Number for assistance. If a foreign first party user is unable to complete iClaim, iAppointment directs them to contact a Social Security representative, and provides a link to SSA's Service Around the World website.

3. **Use of Information Technology to Collect the Information**
   SSA offers electronic versions of this information collection (specifically, MCS and iClaim) under the agency's Government Paperwork Elimination Act plan. Approximately 94% of respondents submit their applications via electronic methods.

4. **Why We Cannot Use Duplicate Information**
   The nature of the information we collect and the manner in which we collect it preclude duplication. SSA does not use any other collection instrument to gather the data we are collecting here.

5. **Minimizing Burden on Small Respondents**
   This collection does not significantly affect small businesses or other small entities.

6. **Consequence of Not Collecting Information or Collecting it Less Frequently**
   If SSA did not collect this information, the public would have no way to apply for Social Security benefits, which would be a direct violation of regulations *20 CFR 404.310-404.311, 404.315-404.322, 404.330-404.333, 404.601-404.603, and 404.1501-404.1512*. Because we only collect the information once, 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 conduct this information collection 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 May 12, 2017, at 82 FR 22173, and we received no public comments. The 30-day FRN published on July 27, 2017 at 82FR 35022. If we receive any comments in response to this Notice, we will forward them to OMB.

9. **Payment or Gifts to Respondents**
   SSA provides no payments or gifts to the respondents.

10. **Assurances of Confidentiality**
    SSA protects and holds confidential the information we are requesting 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. Additionally, SSA protects and holds confidential the information it receives by adhering to our Internet Privacy Policy, which stipulates:

    - The public does not need to give us personal information to visit our site;

    - We collect personally identifiable information (name, SSN, DOB or e-mail) only if we know beneficiaries or their representatives provided it;

    - We only use personal identifying information in conjunction with services beneficiaries requested at the time they submitted the information to us;

    - We sometimes perform statistical analyses of user behavior in order to assess

customer interest in the various areas of our site. We will disclose this information to third parties only in aggregate, never specific form;

- We never give, sell, or transfer any personal information to a third party.

We also take the following measures to ensure the confidentiality of applicants' personal information:

- We encrypt all electronic requests using the Secure Socket Layer (SSL) security protocol. SSL encryption prevents a third party from reading the transmitted data even if they intercept any data. This protocol is an industry standard used by banks such as Wells Fargo and Bank of America for Internet banking;

- We give applicants adequate warnings that the Internet is an open system, and there is no absolute guarantee others will not intercept and decrypt the personal information the applicants submitted. We advise applicants about alternative methods of requesting personal information, i.e., personal visit to a field office or a call to the 800 number;

- We will only allow requestors access to additional screens used for making changes to personal information or requests to SSA once we verify requestor identity.

11. Justification for Sensitive Questions
The information collection does not contain any questions of a sensitive nature.

12. Estimates of Public Reporting Burden
Below we provide annual burden estimates for the multiple components of this information collection:

SSA-1

Modality of Completion	Number of Respondents	Frequency of Response	Average Burden Per Response (minutes)	Estimated Annual Burden (hours)
Paper version/SSA-1	1811	1	11	332
Interview/MCS	1,438,058	1	10	239,676
Medicare Only SSA-1 paper form (abbreviate)	173	1	7	20
Medicare Only-Interview/MCS	204,380	1	7	23,844
Totals	**1,644,422**			**263,872**

SSA-2

Modality of Completion	Number of Respondents	Frequency of Response	Average Burden Per Response (minutes)	Estimated Annual Burden (hours)
Paper version/SSA-2	972	1	15	243
Interview/MCS	447,610	1	14	104,442
Totals	**448,582**			**104,685**

SSA-16

Modality of Completion	Number of Respondents	Frequency of Response	Average Burden Per Response (minutes)	Estimated Annual Burden (hours)
Paper version/SSA-16	40,346	1	20	13,449
Interview/MCS	1,159,121	1	19	367,055
Totals	**1,199,467**			**380,504**

iClaim Screens

Modality of Completion	Number of Respondents	Frequency of Response	Average Burden Per Response (minutes)	Estimated Annual Burden (hours)
iClaim 3rd Party	350,519	1	15	87,630
iClaim Applicant after 3rd Party Completion	350,519	1	5	29,210
First Party iClaim Domestic Applicant	2,283,301	1	15	570,825
First Party iClaim Foreign Applicant	11,373	1	18	3,412
Medicare-only iClaim	797,709	1	10	132,952
Totals	**3,793,421**			**824,029**

iAppointment Screens

Modality of Completion	Number of Respondents	Frequency of Response	Average Burden Per Response (minutes)	Estimated Annual Burden (hours)
iAppointment	17,621	1	10	2,937

Grand Total

Modality of Completion	Number of Respondents	Frequency of Response	Average Burden Per Response (minutes)	Estimated Annual Burden (hours)
Total	7,103,513			1,576,027

The total burden for this ICR is **1,576,027 hours**. This figure represents burden hours and we did not calculate a separate cost burden.

13. **Annual Cost Burden to the Respondents (Other)**
This collection does not impose a known cost burden to the respondents. This is an information collection request which individuals use to apply for benefits; there are no fees or costs associated with the application.

14. **Annual Cost To Federal Government**
The annual cost to the Federal Government is approximately $66,625,863. This estimate accounts for costs from the following areas: (1) designing, printing, and distributing the paper forms; (2) SSA employee (e.g., field office, 800 number, DDS staff) information collection and processing time; and (3) systems development, updating, and maintenance costs for the electronic systems.

15. **Program Changes or Adjustments to the Information Collection Request**
The significant decrease in burden stems from two areas: 1) an overall decrease of 672,907 respondents in the number of individuals applying for benefits through iClaim; and 2) a decrease of 3,794,488 respondents in the number of individuals using the paper forms or personal interviews with a field office employee who records the data on the MCS screens. The significant decrease overall in the iClaim burden, is due the elimination of an unnecessary double filing of applications in FY 2015, where we had duplicate submissions to iClaim from third party attorneys. SSA clarified the online process for third parties in FY 2016, which significantly reduced the number of duplicate submissions, and corrected this problem. Our current burden information reflects this correction as a decrease in burden. In addition, we note that more respondents are using iClaim rather than the paper modalities, which reduces the burden for the paper forms, and increases the burden for iClaim by 85,151 respondents. As we have mentioned previously, the iClaim process only shows those questions each respondent needs to complete; thereby making it a faster process for the respondent, which decreases the burden for those who no longer use the paper versions. Finally, we also show a very slight burden increase of 5 minutes per response for the additional foreign work questions that we include in iClaim for respondents applying for retirement or disability benefits. This burden increase of 5,658 hours annually is offset by the significant decrease in the overall usage for all of our information collections within this information collection request.

16. Plans for Publication Information Collection Results
SSA will not publish the results of the information collection.

17. Displaying the OMB Approval Expiration Date
For the paper forms SSA-1, SSA-2, and SSA-16, 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 MCS or for the Internet (iClaim) and iAppointment applications.

18. Exception 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. Collection of Information Employing Statistical Methodologies

This information collection does not use statistical methods.