



## Default Question Block

### Survey for Economic Growth, Regulatory Relief, and Consumer Protection Act (P.L. 115-174 Section 215 - Reducing Identify Fraud)

The Social Security Administration (SSA or agency) offers a fee-based service called the Consent Based Social Security Number Verification (CBSV), where we provide social security number (SSN) verifications based on the SSN holder's written consent. CBSV does not verify an individual's identity.

Entities that wish to enroll in CBSV must pay an initial enrollment fee, sign a user agreement, and make an advance payment for their estimated transaction volume. Before submitting a verification request, the participating entity must secure written consent from the SSN holder via a wet (pen and ink) signature on Form SSA-89. CBSV compares the submitted name, date of birth (DOB), and SSN against our master file and provides a "no" response or a "yes" response with a death indicator if our records indicate the individual is deceased. Participating entities must agree to an annual audit performed by an independent Certified Public Accounting firm chosen by SSA.

Public Law 115-174, Economic Growth, Regulatory Relief, and Consumer Protection Act, was enacted to reduce synthetic identity fraud. The law requires SSA to accept an individual's electronically signed consent (electronic consent), which authorizes SSA to provide financial institutions or "permitted entities" verification of the individual's name, DOB, and SSN. "Permitted entity" includes a financial institution (as the term is defined in section 509 of the Gramm-Leach-Bliley Act) or a financial institution's service provider, subsidiary, affiliate, agent, subcontractor, or assignee. Public Law 115-174 requires SSA to: (1) establish or modify a current system for SSN verifications; (2) certify an entity as a permitted entity every two years; and (3) audit and monitor performance. SSA may not begin development of the verification system until 50 percent of the program start-up costs are collected from participating companies. SSA is interested in gauging potential permitted entities' interest in the service via the survey below.

Please complete the survey in its entirety. All information is required unless noted as optional. The information you provide will be disclosed to SSA in a non-identifiable format. For this survey, we also welcome responses from companies whose use of SSN verifications are not associated with financial activities of a financial institution. Your response does not constitute a financial or legal commitment of any kind. For questions about the survey tool, email [benchmarking@aba.com](mailto:benchmarking@aba.com). Thank you for your time and response.

**Paperwork Reduction Act Statement** - This information collection meets the requirements of 44 U.S.C.

§ 3507, as amended by section 2 of the Paperwork Reduction Act of 1995. You do not need to answer these questions unless we display a valid Office of Management and Budget (OMB) control number. We estimate that it will take about 15 minutes to read the instructions, gather the facts, and answer the

questions. Send only comments relating to our time estimate above to: SSA, 6401 Security Blvd, Baltimore, MD 21235-6401.

**You may complete this survey in several sessions. Any time you click on the "Next" button, your responses are automatically saved and a place holder is created. Next time you start the survey session, you will be placed where you had previously ended. As long as you do not click on the "Submit" button at the end of the survey, you can use the "Back" button to review and revise your responses.**

*To continue, click on "Next" below:*

Information about your company:

- We are a financial institution – specify company name:
- We are a non-financial business/organization – specify company name:

1. The existing CBSV system allows a single company to either connect directly with SSA as a "Requesting Party" or utilize a third party (such as a data broker) to submit SSN verification requests to SSA if the company obtained the number holder's written consent, signed with a wet signature. With the new electronic signature consent process, would your company prefer to submit SSN verification requests directly to SSA, or to use a third party to submit SSN verification requests on your behalf? (select one)

- Enroll directly with the SSA
- Use a third party to submit SSN verifications on our behalf

2. The new law directs SSA to build a new system or modify a current system to allow permitted entities to submit real-time SSN

verification requests based on a consumer's electronically signed consent in connection with a credit transaction or any circumstance described in section 604 of the Fair Credit Reporting Act (15 U.S.C. 1681b). Please see the questions, below:

2a. For which of the following product lines would your firm consider utilizing this new service from the SSA? (select all that apply)

- Credit Cards
- Auto Lending
- Mortgage
- Personal Loans
- Deposit Account Opening
- Retirement Account Opening
- Home Equity Line of Credit (HELOC)
- Lines of Credit (excluding HELOC)
- Other (please specify):

2b. For each of the product lines you checked in Question 2a, approximately how many applications do you receive annually (regardless of whether approved/denied)?

Number of Applications Received Annually by Product Line

Credit Cards	<input style="width: 150px; height: 20px;" type="text"/>
Auto Lending	<input style="width: 150px; height: 20px;" type="text"/>
Mortgage	<input style="width: 150px; height: 20px;" type="text"/>
Personal Loans	<input style="width: 150px; height: 20px;" type="text"/>
Deposit Account Opening	<input style="width: 150px; height: 20px;" type="text"/>
Retirement Account Opening	<input style="width: 150px; height: 20px;" type="text"/>
Home Equity Line of Credit (HELOC)	<input style="width: 150px; height: 20px;" type="text"/>
Lines of Credit (excluding HELOC)	<input style="width: 150px; height: 20px;" type="text"/>

Number of Applications Received Annually by Product Line

Other (please specify):



3. For the products indicated in your response to Question 2a, would your company either request a SSN verification for every application received, or request a verification as an element of a final fraud check?

If you answer "Request for a final fraud check" or "Other" for any products: Approximately what percentage of applications does your company request a SSN verification annually?

	SSN Verification (select one)			If "Request for a final fraud check" or "Other" is selected:
	Request a verification for every application	Request for a final fraud check	Other	Report percentage of applications you request a SSN verification annually (%)
Credit Cards	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="text"/>
Auto Lending	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="text"/>
Mortgage	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="text"/>
Personal Loans	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="text"/>
Deposit Account Opening	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="text"/>
Retirement Account Opening	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="text"/>
Home Equity Line of Credit (HELOC)	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="text"/>
Lines of Credit (excluding HELOC)	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="text"/>
Other (please specify): <input type="text"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="text"/>

4. For the products indicated in your response to Question 2a, are you likely to perform an SSN verification of new customers, existing customers, or both?

If you answer "For new customers only" for any products: Approximately what percentage of applications received (for each product line) would concern new customers?

	SSN Verification (select one)			If "For new customers only" is selected: Report percentage of applications received that are from new customers (%)
	For new customers only	For existing customers only	For both new and existing customers	
Credit Cards	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="text"/>
Auto Lending	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="text"/>
Mortgage	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="text"/>
Personal Loans	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="text"/>
Deposit Account Opening	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="text"/>
Retirement Account Opening	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="text"/>
Home Equity Line of Credit (HELOC)	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="text"/>
Lines of Credit (excluding HELOC)	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="text"/>
Other (please specify): <input type="text"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="text"/>

5. The new or modified verification system will support real-time queries (single record validations) and batch processing (multiple record validations processed within 24 hours), which process does your company anticipate utilizing?

- Real-time queries
- Batch processing
- Both

6. How many SSN verification requests per year do you estimate would fall into each category (real-time queries versus batch process)?

Real-time queries

Batch processing

7. The system allows real-time queries for single SSN verifications, what is your preferred method to interact with this system real time?

- Through a web page
- Stand-alone Application Programming Interface (API)
- An API embedded in another application
- Other (please specify):

8. What does your company need from SSA to ensure that the preferred access method mentioned in your response to Question 7 works?

9. Will your company need to re-disclose SSA data to a third party?

- Yes (please specify):
- No

10. What data exchange elements will flow to and from your partners accessing this service? (check all that apply)

- SSN
- Name
- Date of birth

SSN verification results

Other (please specify):

11. Is your company willing to pay a fee (credited to your future costs) in advance so that SSA may begin system development for the service?

Yes

No

Not sure

Additional comments:

Your functional area:

Lending (consumer credit, mortgages)

Retail banking

Wealth management

Operations

Other (please specify):

**Submit Survey**

***You may review your responses by clicking on the "Back" button and revise as appropriate. If you have entered all responses, please click the "Submit" button.***

***Thank you for completing this reporting form for your bank.***