

Justification for Non-Substantive Changes for myWageReport
20 CFR 404.1520(b), 404.1571-1576, & 404.1584-1593
OMB No. 0960-0808

Justification for Non-Substantive Changes to the Collection or Resubmission of the Collection within One Year of OMB Approval

Background

Section 826 of the *Bipartisan Budget Act (BBA) of 2015, P.L. 114-74* mandates the Social Security Administration (SSA) to implement a system that allows Title II disability (SSDI) beneficiaries and their representatives to report earnings through electronic means in a fashion similar to the automated reporting options available to Title XVI recipients. We are implementing the changes addressed below within one year of OMB approval of myWageReport to expand the availability of the application to Title XVI. We have also made several enhancements to the collection to add new functionality and improve user experience. These modifications are critical to supporting SSA's commitment to reduce improper payments due to reporting failures and constitute a significant improvement over existing processes.

SSA cannot delay implementation of these changes until the next collection renewal without disadvantaging our clients. We could not include the changes described below in the previous submission to OMB due to time constraints to meet the legislative mandate for Title II reporting, and due to the incremental nature of SSA's development approach in creating myWageReport. Unless otherwise noted, we expect to implement the expanded functionality via the changes discussed below in the next public release scheduled for **June 2018**.

New User Group

- **Change #1:** We are expanding wage reporting via the myWageReport application to individuals who receive benefits under Title XVI of the Social Security Act and those who receive a combination of benefits under Title II and Title XVI, hereafter referred to as concurrent beneficiaries. Representative payees of Title XVI and concurrent beneficiaries will also have the ability to use the application, as will certain individuals whose income we consider in determining a Title XVI recipient's eligibility or payment amount (i.e., a parent or spouse of a recipient).

Justification #1: Wage related payment errors remain among the leading causes of improper payments for the Title XVI program, and we rely heavily on recipient reporting to prevent improper payments. While we have a variety of wage reporting options available to our Title XVI recipients (i.e. the Supplemental Security Income Telephone Wage Reporting system, and Mobile Wage Reporting application), myWageReport offers more detailed reporting, and opens up automated wage reporting to individuals who were previously excluded from automated reporting due to systems limitations.

- **Change #2:** We are adding a Monthly Reporting Acknowledgement screen. We created a customized version of this screen for Title XVI and concurrent users reporting their own earnings (2.1.1), and for representative payees reporting on behalf of Title XVI and concurrent individuals (2.1.2). This screen informs Title XVI, concurrent users, and their representative payees of additional restrictions for wage reporting imposed due to the type of benefits received. It collects the user's acknowledgement of the additional restrictions. **(Page 4 and 5)**

Justification #2: The Monthly Reporting Acknowledgement screen is necessary to encourage proper use of the application. Due to differences between Title II and Title XVI program rules, and between each program's respective use of wage data, we will limit the allowable reporting period to the prior month only for Title XVI and concurrent users. Title II reporters will not experience this restriction and can continue to use the collection to report up to 24 months of past wages.

- **Change #3:** We are adding a Monthly Reporting Acknowledgement Error screen for Title XVI and concurrent self-reporters, and representative payees (2.1.3). This variant screen prompts users to acknowledge the monthly reporting requirement for Title XVI and concurrent reporters discussed in Change #1 when they attempt to proceed through the screen without supplying the necessary response **(Page 6)**.

Justification #3: This screen is necessary to encourage proper use of the application and guide users to the next step in the screen progression.

- **Change #4:** We are adding Employer Wage Confirmation Screens for Title XVI and concurrent self-reporters, and representative payees (2.2.1). This screen appears for all Title XVI and concurrent users prior to the Wage Report Review screen if there is a discrepancy between the worker's selected frequency of pay and the number of pay stubs entered. This screen alerts users to incomplete entries and potential inconsistencies in entered wage data. **(Page 7)**.

Justification #4: This variant screen is critical to encouraging accurate submission of wage reports. We designed it to encourage users to respond with necessary information or check the data they entered for possible errors.

- **Change #5:** We are adding the Overlapping Pay Period Warning screen (2.3) for Title II, Title XVI, and concurrent users. This screen displays after Title II, Title XVI, and concurrent users enter pay stub information if the pay period start and end dates they enter overlap with any existing wage entries for that employer. It alerts users to potential inconsistencies in wage data. **(Page 8)**

Justification #5: This variant screen is critical to encouraging accurate submission of wage reports. We designed the screen to encourage users to check the data they entered for possible errors. We intend to implement this in the June 2018 release of myWageReport; however, depending on the availability of resources, we may need to

postpone implementation to a release scheduled later this year. If we are not able to implement on time, we will inform OMB through a subsequent Change Request.

- **Change #6:** On the My Social Security Landing Page (3.1), we added customized language in the wage report teaser for Title XVI and concurrent users informing them when they can report wages and what information we need. The language that appears in the teaser will be customized to the wage reporter's role (i.e. a Title XVI self-reporter; representative payee; a parent or spouse whose wages count when determining a Title XVI recipient's eligibility).

New Customized Teaser Language:

“If you receive Supplemental Security Income (SSI), or are a spouse, parent, or sponsor for someone receiving SSI, you may report monthly wages online.”

“We are accepting wage reports for the entire month of [prior Month and YYYY]. If you need to report wages paid in [current Month], check back beginning [next Month] 1.”
(Page 9 and 10)

“If you are a representative payee for someone receiving Social Security Disability or Supplemental Security Income, you may report their wages online.” (Page 11)

“If you are receiving Social Security Disability or Supplemental Security Income (SSI) and are working, or are a representative payee for someone receiving Social Security Disability or SSI, you may report wages online.” **(Page 12)**

Justification #6: Expanding use of myWageReport to Title XVI requires SSA to accommodate new categories of users and set new parameters for the application's use. We designed the modifications to the language on the teaser to create a customized user experience with instructions tailored to the reporter. Due to differences between Title II and Title XVI program rules, and between each program's respective uses of wage data, we must limit the allowable reporting period to the prior month only for Title XVI and concurrent users. This customized language on the very first page in the screen progression clearly sets the parameters for these users and encourages proper use of the application.

- **Change #7:** On the Employer Wage Table Screen (3.2.1) (**page 13**), we are removing references to “paychecks” and “pay periods,” opting instead for general language that is more consistent with language shown on other wage reporting tools.

Before: “How frequently do you receive a paycheck from this employer?”

After: “How frequently are you paid by this employer?”

Before: “Add or update pay periods below to report wages for this employer”

After: “Add or update pay stub information below to report wages for this employer”

Before: “Please select the button below to add pay period”

After: “Please select the button below to report wages.”

Before: “Add pay period for this employer”

After: “Add pay stub for this employer”

Justification #7: The minor adjustments to language on this screen promote consistent terminology across the various wage-reporting methods and prevent inaccurate reports due to user confusion over terminology.

- **Change #8:** On the Wage Report Review Screen (3.3), we added customized language to remind Title XVI and concurrent self-reporters (3.3.1) and representative payees for this user subgroup (3.3.2) about the restricted reporting timeframe. We provided customized instructions applicable to Title XVI and concurrent reporters and removed references to “paychecks” to promote consistent terminology across Title XVI wage reporting options.

Self-Reporter Variation (3.3.1)

Old Language: “Your wage report has not yet been submitted.”

New Language: “Your wage report has not yet been submitted. Please be sure you have reported all wages for [prior Month] before submitting.”

Old Language: “How frequently do you receive a paycheck from this employer?”

New Language: “How frequently are you paid by this employer?”
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Representative Payee variation (3.3.2)

Old Language: “How frequently does [name of recipient] receive a paycheck from this employer?”

New Language: “How frequently is [name of recipient] paid by this employer?”
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Applicable to Both (3.3.1 and 3.3.2)

Old Language: “You will no longer be able to change this information once you submit the report. Additional wages can be added by submitting a new report.”

New Language: “Your wage report must include all wages paid by all employers in [prior Month]. You will need to contact your local field office or [link:] contact us to make any changes after you submit this report.”

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Justification #8: The customized language reinforces the restricted reporting timeframe and encourages accurate and complete monthly wage reports for Title XVI and concurrent reporters. Replacing “paycheck” with more general language promotes consistent terminology across the various wage-reporting methods, preventing inaccuracies due to user confusion over terminology.

- **Change #9:** On Wage Report Confirmation Screen (3.4), we added language to remind users about the restricted reporting timeframe for Title XVI and concurrent reports and included a message to encourage users to report their wages early in the month to prevent improper payments. We also removed the option to “Add New Wage Report” for Title XVI and concurrent users.

Title XVI Self-Reporters (3.4.1)

Old Language: “Your wage report was successfully submitted at [time] on [date]. We highly recommend that you print or save a copy of the wage report receipt for your records.”

New Language: “Your wage report for [prior Month] was successfully submitted at [time] on [date]. We recommend that you print or save a copy of the wage report receipt for your records. Please report your wages for [current Month] in the first six days of [next Month] to avoid incorrect payments.”

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Concurrent Self-Reporters (3.4.2)

Old Language: “Your wage report was successfully submitted at [time] on [date]. We highly recommend that you print or save a copy of the wage report receipt for your records.”

New Language: “Your wage report for [prior Month] was successfully submitted at [time] on [date]. We recommend that you print or save a copy of the wage report receipt for your records. Please report your wages for [current Month] in the first six days of [next Month] to avoid incorrect payments. To report any wages that you received before [prior Month and YYYY], [link:] contact us or contact your local field office.”

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Representative Payee for Title XVI Recipient (3.4.3)

Old Language: “Your wage report was successfully submitted at [time] on [date]. We highly recommend that you print or save a copy of the wage report receipt for your records.”

New Language: “Your wage report for [prior Month] was successfully submitted at [time] on [date]. We recommend that you print or save a copy of the wage report receipt for your records. Please report [name of recipient]’s wages for [current Month] in the first six days of [next Month] to avoid incorrect payments.”

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Representative Payee for Concurrent Recipient (3.4.4)

Old Language: “Your wage report was successfully submitted at [time] on [date]. We highly recommend that you print or save a copy of the wage report receipt for your records.”

New Language: “Your wage report for [prior Month] was successfully submitted at [time] on [date]. We recommend that you print or save a copy of the wage report receipt for your records. Please report [name of recipient]’s wages for [current Month] in the first six days of [next Month] to avoid incorrect payments. To report any wages that [name of recipient] received before [prior Month and YYYY], [link:] contact us or contact your local field office.”

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Applicable to All (3.4.1, 3.4.2, 3.4.3, and 3.4.4)

Old Language: “[link:] Contact us to report self-employment earnings and work changes.”

New Language: “[link:] Contact us or contact your local field office to report self-employment earnings and work changes.”

(Page 16 and 17)

Justification #9: We are limiting the allowable reporting period to the prior month only for Title XVI and concurrent users. This added language reminds this subgroup of users of the more restrictive wage reporting requirements and promotes early and accurate reporting of wages. Language changes promoting consistent terminology will ensure a smooth transition to myWageReport for Title XVI and concurrent users who currently use other automated methods of wage reporting, and will prevent erroneous reports due to inconsistent language. We removed the option to “Add New Wage Report” for this subgroup because we are encouraging Title XVI and concurrent reporters to submit only one report to us per month containing all of the relevant wages, in keeping with our current practices across our other wage reporting options.

- **Change #10:** On Wage Report Receipt (3.5), we have added a customized receipt for Title XVI and concurrent users (3.5.1) and their representative payees (3.5.2). We modeled this notice after the receipt we currently issue to Title XVI and concurrent reporters or their representative payees when they submit wage reports via other methods. **(Page 18 and 19)**

Justification #10: By law, Social Security must issue receipts to recipients and their representative payees who contact us to report a change to their work or earnings. The customized language on the receipt for Title XVI and concurrent reporters is necessary to reassure users that SSA received their report and that we will take appropriate action. The customized language prevents confusion and lessens the potential for follow up contacts with SSA staff.

Change to Estimates of Public Reporting Burden

- **Change #11:** We have modified our estimate of public reporting burden:

We anticipate that the expanded availability of myWageReport to Title XVI and concurrent users will affect the public burden estimate for the myWageReport application. On the Supporting Statement for myWageReport, we initially estimated approximately 54,000 respondents would take 7 minutes each to complete a report of earnings via the myWageReport application. With expanded functionality to Title XVI and concurrent users and the additional screens, we now estimate that a combined **458,000 respondents** will take **8 minutes** to complete a report of earnings. The total annual burden hour estimate after consideration of these changes is **61,067**.

Modality of Completion	Number of Respondents	Frequency of Response	Average Burden Per Response (minutes)	Estimated Total Annual Burden (hours)
myWageReport	458,000	1	8	61,067

Justification #11: We based the change to our burden estimate on existing data from automated reporting options presently available to Title XVI recipients only. We expect some users will switch from using telephone and mobile wage reporting methods to the new tool. We also anticipate that individuals who were unable to use the available automated reporting methods will begin reporting using myWageReport. Since the application is very new and we have not yet expanded its availability to all of the intended user groups, we are not able to base our estimate on actual usage statistics from the application at this time. We will update the burden estimate using available management information during the next renewal.

We intend to implement these changes in June 2018, after OMB’s approval.