**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 # 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.

We are adding a new application behind the authentication of electronic access. We aim to improve the overall user experience by offering the public the *my* Social Security Benefit Entitlement Center (BEC) Retirement Calculator from the *my* Social Security landing page (which users access once they complete their authentication through electronic access). This will be the most secure and accurate retirement calculator the agency has ever offered. The *my* Social Security BEC Retirement Calculator will have two new major capabilities that will allow our users to obtain estimates that are more accurate:

- Users will be able to obtain a monthly retirement benefit estimate based on a month and year of election. This is different from current calculators we offer, as our legacy calculators only allow for an estimate based on age in years.

- Users will also be able to input their estimated earnings growth per year as either a dollar amount or percentage and then see the resulting effect on their future retirement benefit estimates. Then they can view, based on this information, how their retirement benefit estimate will change for any specific month or year of election.

In our upcoming systems release, we are updating some of the *my* Social Security electronic access requirements to ensure continued security and to enhance the system. We are also making these backend functionality changes to allow the agency to move towards compliance with the National Institute of Standards and Technology (NIST) Special Publication 800-63-3 guidelines.

Due to the agile nature of our projects, another change request will follow up within six to nine months to request approval of additional updates to the system (see the Future Plans section below).

Revisions to the Collection Instrument

- **Change #1:** We are adding a new application behind the authentication of *my* Social Security, the Benefit Entitlement Center (BEC) Retirement Calculator.

  Justification #1: We aim to improve the overall user experience by offering the public this service. This will be the most secure and accurate retirement calculator the agency has ever offered.

- **Change #2:** We are making minor language changes and button highlight changes to several Registration and Customer Support (RCS) screens.

  Justification #2: We are making these changes to create easier readability as well as making the primary and secondary buttons more distinct.

- **Change #3:** We added an additional bullet to the Sign-In Terms of Service screen.

  Justification #3: This change fulfills a requirement from our Office of General Counsel (OGC).

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 on our *my* Social Security landing page. 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 3/26/2019.

Based on our current management information data for the current Retirement Estimator (approved under OMB #0960-0596, along with our Knowledge Based Authentication), we estimate approximately 1,423,084 respondents will likely register through electronic access to use the new Benefit Entitlement Center (BEC) Retirement Calculator screens through our *my* Social Security landing page to estimate their retirement data. Our current management information data also shows that approximately 5% of all electronic access registrations use our Intranet, RCS screens, rather than the Internet screens. Based on this data, we estimate an increase of 1,351,930 respondents for our Internet registration, and 71,154 respondents for our Intranet registration (RCS screens).

Therefore, we estimate 65,382,468 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 the registration, resulting in an annual reporting burden of 8,717,662 hours for the Internet process.

In addition, we estimate that 3,438,128 respondents will use the Intranet process (RCS) annually to create and manage an account with us, so they can then authenticate through our Internet screens. We estimate that it takes an average of 8 minutes to complete this transaction, resulting in an annual reporting burden of 458,417 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. As mentioned above, we estimate an additional 1,423,084 registrations due to the additional services offered on our *my* Social Security landing page. 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)	Estimated Total Annual Burden Hours (hours)	Average Hourly Wage (dollars)*	Total Annual Opportunity Cost (dollars)**
Internet Registration	65,382,468	1	8	8,717,662	$22.50	$196,147,395.00
Intranet Registration (RCS)	3,438,128	1	8	458,417	$22.50	$10,314,382.50
Totals:	68,820,596			9,176,079		$206,461,777.50

* We based this figure on the average U.S. worker's hourly salary from the Bureau of Labor Statistics FY2018 data.

** This figure does not represent actual costs that SSA is imposing on recipients of Social Security payments to complete this application; rather, these are theoretical opportunity costs for the additional time respondents will spend to complete the application.

We estimate the total annual burden for this information collection will be **9,176,079 hours**. We based the estimates on current management information data. These figures represent burden hours, and the theoretical opportunity cost burden for completing and submitting the information.

Future Plans
Due to the agile nature of our projects, we expect to move more applications to our *my* Social Security landing page, which users access through the electronic access authentication. At this time, we are still finalizing our IT modernization plans for these changes. We expect to submit another change request within six to nine months to request approval for additional updates to the system, and, potentially, update the burden again to include more users if we are able to move more applications to our *my* Social Security landing page.