Justification for the Non-Substantive Changes for
Request for Internet Services & 800# Automated Telephone Services
Knowledge-Based Authentication (RISA-KBA)
20 CFR 401.45
OMB No. 0960-0596

Background

We are making a non-substantive change, within a year of OMB approval, to update the public reporting burden. The Social Security Administration created a version of the Retirement Estimator (RE) application that will now be accessible behind the authentication of the *my* Social Security landing page (our Public Credentialing and Authentication Process, hereafter called "electronic access," OMB #0960-0789). We aim to improve the overall user experience by offering the public the *my* Social Security Benefit Entitlement Center (BEC) Retirement Calculator. This will be the most secure and accurate retirement calculator the agency has ever offered.

SSA is making the following revisions:

- **Change #1:** We are reducing the public burden for the RE application accessible through our Knowledge-Based Authentication.

  Justification #1: We are reducing the public burden since we estimate that a portion of our respondents will register to use the new authentication version of the RE application through *my* Social Security (electronic access OMB #0960-0789).

Estimates of Public Reporting Burden

We are adjusting the burden to reflect the reduction in burden to 0960-0596, due to the addition of Retirement Estimator behind the authentication of *my* Social Security (electronic access OMB #0960-0789). This change will reduce the annual number of respondents by 1,423,084 to this information collection.

Although we are reporting the burden reduction now (at the same time as we are reporting the burden increase for 0960-0789), we do not anticipate seeing these burden changes until 2021, after respondents choose to use the new retirement estimator on our *my* Social Security landing page. We estimated the decreased burden based on our current Management Information (MI) data along with a gradual decrease as more respondents move to use *my* Social Security.

See chart below with the updated figures:

Modality of	Number of	Frequency	Average	Estimated	Average	Total Annual

Completion	Respondents	of Response	Burden Per Response (minutes)	Total Annual Burden Hours (hours)	Hourly Wage (dollars)**	Opportunity Cost (dollars)***
Internet Requestor	1,480,818	1	2.5	61,701	$22.50	$1,388,273
Telephone Requestors	9,795,655	1	4	653,044	$22.50	$14,693,490
*Change of Address (on hold)	1			1		
*Screen Splash (on hold)	1			1		
Totals	**11,276,475**			**714,747**		**$16,081,763**

*We previously reduced the burden to a one-hour placeholder for Screen Splash and Change of Address because we are not currently using these automated telephone applications. We are working on ways to strengthen and secure our online and automated telephone services, to streamline service delivery, and to improve customer service by not duplicating verification data.

**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 **714,747 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.