

**Justification for Non-Substantive Changes for
Internet Direct Deposit Application
31 CFR 210
OMB No. 0960-0634**

Background

We are adding a new modality for our Internet Direct Deposit application behind the authentication for SSA's Public Credentialing and Authentication Process (hereafter called "electronic access"). This new modality, which we call myDirect Deposit will be accessible from our [my Social Security](#) landing page (which users access once they complete their authentication through electronic access). Since the [my Social Security](#) landing page is only accessible via our electronic access authentication, which uses much stronger authentication than our current knowledge-based authentication (approved under OMB # 0960-0596), we will be able to make these new screens accessible to representative payee respondents.

Currently, representative payee respondents who needed to complete the Direct Deposit application on behalf of the Title II beneficiaries they represent need to complete the application through a personal interview in a field office, which we record on one of our Intranet modalities. We do this verify the identity of the representative payee, and ensure they fill out the application on behalf of the correct beneficiary. Since our electronic access process is more secure, we feel confident that we can continue to monitor and ensure the correct representative payee is accessing the information from our since the [my Social Security](#) landing page.

We expect the new MyDirect Deposit screens will make it easier for representative payees to enroll their Title II beneficiaries in direct deposit. We also anticipate that this new modality will increase our burden for our Internet Direct Deposit, and decrease the burden for our other Direct Deposit application modalities (as seen in the chart below). We will not remove our current Internet Direct Deposit from our main website. We are merely adding the new myDirect Deposit screens as an alternate means to access the Internet Direct Deposit application.

Justification for Non-Substantive Changes

- **Change #1:** We are creating a version of the Internet Direct Deposit application behind our "electronic access" authentication, approved under OMB #0960-0789. This new myDirect Deposit application will be accessible only from our [my Social Security](#) landing page.

Justification #1: The creation of the new myDirect Deposit screens on our [my Social Security](#) landing page will allow users to sign up for, or access the Internet Direct Deposit, from the [my Social Security](#) landing page, rather than require them to leave the [my Social Security](#) landing page, and return to our main

website to access Direct Deposit.

- **Change #2:** We will allow individual representative payees the ability to use myDirect Deposit to enroll in direct deposit via the Internet for all authorized Title II beneficiaries the user represents, and for all their represented beneficiaries who still need to enroll in direct deposit.

Justification #2: Since the *my Social Security* landing page is only accessible via our electronic access authentication, which is much stronger than our current knowledge-based authentication (approved under OMB # 0960-0596), we will be able to make these new screens accessible to representative payee respondents. We were not able to do so previously, as we need to be able to ensure the representative payees are authorized to sign up the Title II beneficiaries they represent before we can allow them to do so. Previously, we only allowed representative payees to enroll beneficiaries through our Intranet process, since it is an in-person process and allows us to ensure the correct representative payee is submitting the information. Since our electronic access process is more secure, we feel confident that we can continue to monitor and ensure the correct representative payee is accessing the information from our since the *my Social Security* landing page.

In addition, we anticipate this will make it easier for representative payees to enroll their Title II beneficiaries in direct deposit, as they will be able to do so online, rather than through one of our Intranet processes in the field office.

- **Change #3:** We will allow individual representative payees who use the *my Social Security* landing page the ability to update direct deposit information for all authorized beneficiaries that the user represents who already enrolled in direct deposit.

Justification #3: We anticipate this will make it easier for representative payees to enroll their Title II beneficiaries in direct deposit, as they will be able to do so online, rather than through one of our Intranet processes in the field office.

- **Change #4:** We will display current benefit types, account information, and payment method for all authorized beneficiaries that the representative payee user represents.

Justification #4: We believe this will clearly provide the representative payee with enough identifiable information for them to be confident that they are selecting the correct beneficiary and the correct task for that person. This will also provide the representative payee with sufficient information to give them confidence that the benefit types, amounts and payment dates of the beneficiaries that they represent are correct.

Change in Burden:

We expect the addition of myDirect Deposit for the representative payees will cause a burden change, as it will increase the usage of our Internet Direct Deposit screens, and decrease the usage of our Intranet versions of these screens.

The burden chart below shows our estimated burden change due to the addition of these new Internet screens:

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 DD	454,106	1	10	75,684	\$22.50*	\$1,702,890**
Non-Electronic Services (FO, 800#-ePath, SSI Claims System, SPS, MACADE, POS, RPS)	3,205,802	1	12	641,160	\$22.50*	\$14,426,100**
Direct Deposit Fraud Indicator	33,238	1	2	1,108	\$22.50*	\$24,930**
Totals	3,693,146			717,952		\$16,153,920**

*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. **There is no actual charge to respondents to complete the application.

NOTE: We previously increased the burden for 0960-0789, SSA's Public Credentialing and Authentication Process in anticipation of the addition of the myDirect Deposit screens. The Change Request OMB approved for 0960-0789 on 8/3/18 reflects this increase. In addition, we also revised our burden information for 0960-0596, Request for Internet Services-Authentication; 800# Automated Telephone Speech Technology-Authentication (Knowledge-Based Authentication) when we completed our triennial

renewal which OMB approved on 11/9/18. While the overall numbers increased for 0960-0596, we show an overall decrease for our Internet knowledge-based authentication. The decrease shown on the triennial renewal includes the decrease we mentioned above for Direct Deposit authentication.

Justification for Resubmission of the Collection within One Year of OMB Approval

We are resubmitting this information collection request (ICR) within one year of OMB approval, as the agency only recently finalized these new myDirect Deposit screens which will give us the secure authentication we need to allow representative payees to use Direct Deposit via the Internet on behalf of the Title II beneficiaries they represent. Since we did not have these finalized screens ready in March 2019 when we submitted this ICR for renewal, we could not include them until now.

We will implement these new myDirect Deposit screens upon OMB approval.