

**Justification for the Non-Substantive Changes for
Social Security Administration’s Public Credentialing and Authentication Process
20 CFR 401.45 & 20 CFR 402
OMB No. 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. The Office of Hearings and Operations Internet Invoicing Application will enable Vocational Experts, Medical Experts, and Verbatim Hearings Recording vendors to submit invoices to SSA on work that they completed as part of their contract with SSA. We will authenticate the vendors via electronic access and authorize them via the Internet Invoicing portal. The system will present the vendors with a listing of work items that they can invoice for SSA. After the vendor selects the items, the system processes the submission within the Hearings and Appeals Case Processing system. These users already have accounts for electronic access; therefore, this new service does not change the public burden.

We are also adding another application called Advance Designation of Representative Payee. We will place a link for this application on the [my Social Security](#) landing page. If the user selects “Yes” to the question “Would you like to advance designate at this time?” they will continue with entering advance designation information. The user can add designees by selecting the “Add Designee” button. The name, phone number, and relationship to the user are required for each designee. Users will be able to update existing designees, delete one or all designees, or change the order of priority at any time. We are obtaining approval for this new application under a separate OMB approval in connection to a Regulation. However, we anticipate that this new application will bring more users to the [my Social Security](#) landing page who will need to register for accounts. Therefore, we are updating our burden for this collection accordingly.

Finally, in our upcoming systems release, we are enhancing our identity proofing (account registration) process by introducing driver license or state identification verification. We are also reducing the agency’s reliance on knowledge-based authentication (KBA), which is our out of wallet (OOW) quiz process per the Digital Transformation Plan. These enhancements improve both security and usability for our users. We are also making these 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 registration path for users that have a driver’s license or state identification card.

Justification #1: These enhancements improve both security and usability for our users.

- **Change #2:** We removed the OOW quiz as a mandatory step for users that choose to register using a driver's license and state identification card option instead.

Justification #2: We are reducing the agency's reliance on knowledge-based authentication (KBA).

- **Change #3:** We are enhancing our address confirmation process to include validation of physical addresses, along with digital addresses, such as email and cell phone numbers.

Justification #3: These enhancements improve both security and usability for our users.

- **Change #4:** We are enhancing our address confirmation process to verify the validated address of record. We verify by sending a code to the address of record and request entry of the code to continue the registration process.

Justification #4: These enhancements improve both security and usability for our users.

- **Change #5:** We are updating our Privacy Act Statement.

Justification #5: SSA's Office of Privacy and Disclosure is updating the Privacy Act Statement for this collection. The updates include revisions to the authorities' portion, removal of Identity Services Provider explanation since it is already mentioned on our Terms of Service (TOS) Screen, and an update to the website that lists all of the agency's system of records notices.

- **Change #6:** We are adding a new screen to give customers the choice to opt-in and try the new registration process in a phased rollout of the updates.

Justification #6: In Phase 2 of the rollout, users who select the "Create Account" button will be presented with a new temporary screen that informs customers that they can opt-in or opt-out of the new registration process. If the user chooses to opt-in, they will be redirected to the new version of registration. If they choose to opt-out, they will be redirected to the current production version of our registration process.

- **Change #7:** We are adding a new application link to the landing page, The Office of Hearings and Operations Internet Invoicing Application.

Justification #7: We are adding the application to allow vendors to submit invoices to SSA on work that has been completed as part of their contract. We do not anticipate that this change will increase the burden for electronic access.

- **Change #8:** We are adding another new application called Advance Designation of Representative Payee.

Justification #8: These enhancements allow users to be able to update existing designees, delete one or all designees, or change the order of priority at any time. We anticipate this change will increase the burden for electronic access.

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 9/16/2019.

The data below is based off our actual Management Information (MI) data for fiscal year 2019. The numbers are different with this reporting due to separating the Internet Registration count from the Internet Sign In count. Previously, we estimated more responses than our MI data currently shows since the last time we obtained OMB approval, thus we are changing the numbers to show more accuracy as well.

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 950,000 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)	Average Theoretical Hourly Cost Amount (dollars)*	Total Annual Opportunity Cost (dollars)**
Internet Registration	6,923,048	1	8	923,073	\$22.50*	\$20,769,143**
Internet Sign-Ins	53,459,180	1	1	890,986	\$22.50*	\$20,047,185**
Intranet Registration (RCS)	2,295,983	1	8	306,131	\$22.50*	\$6,887,948**
Advance Designation of Representative Payee	950,000	1	6	95,000	\$22.50*	\$2,137,500**

Totals	63,628,211			2,215,190		\$49,841,776**
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* 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.**

The total burden for this ICR is **2,215,190** burden hours (reflecting SSA management information data), which results in an associated theoretical (not actual) opportunity cost financial burden of **\$49,841,776**. SSA does not charge respondents to complete our applications.

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.