U.S. Department of Agriculture

Office of the Chief Information Officer (OCIO)

OMB Control Number: 0503-0014

USDA Registration Form to Request Electronic Access Code

Purpose:

The purpose of this OMB review request is to obtain a 3-year renewal and approval for information collection for USDA eAuthentication Service account registration. New USDA customers must provide information during the online registration process and, if applicable, the identity verification process, which is accessible through the USDA eAuthentication web site, www.eauth.usda.gov. This voluntary online self-registration and identity verification process enables USDA customers to obtain accounts that will enable them to access USDA web applications and services via the Internet. The objectives of this self-registration and identity verification process are to employ standardized methods for verifying the identity of USDA customers/partners and to manage their credentials in support of electronic alternatives to traditional ink signatures. In addition, this centralized service eliminates the need for USDA agency applications to build authentication services into each application.

Background:

The USDA provides services to ranchers and farmers ranging from development and economic assistance; farm loans and subsidies; and land, water, and livestock resource management. In addition, the USDA is responsible for the federal government's major agricultural procurements and generation and dissemination of natural resource research data. The USDA also leads the Federal anti-hunger effort by providing human nutrition services through the Food Stamp, School Lunch, School Breakfast, and the Women, Infant, and Children (WIC) Program.

Initially, USDA developed an online user authentication and authorization system known as the Web Central Authentication and Authorization Facility (WebCAAF), which consisted of a one-time registration for customers desiring access to any online service that required authentication. Form AD-2016, USDA Registration Form to Request Electronic Access Code, was used to collect the minimum information necessary to verify and validate the identity of the customer before issuing user access credentials. Despite providing user authentication and authorization electronically, WebCAAF exhibited limited capabilities in that it serviced only form submissions of the USDA Service Center Agencies (SCA)s and required a manual submission process for Form AD-2016.

In January 2003, the USDA initiated the eAuthentication Service, an expanded USDA enterprise wide authentication and authorization service for all USDA web-based applications to provide a single point of entry for conducting business online with USDA. Customers desiring access to any service that utilizes eAuthentication are required to complete a one-time electronic self-registration to obtain an eAuthentication account. An account provides users with limited access to USDA web sites. Customers wanting to conduct USDA official electronic business transactions, enter into a contract with the USDA, or submit USDA forms electronically via the Internet must verify their identity. The identity proofing process does not have to be completed immediately following the eAuthentication account registration. USDA web applications restricting access to eAuthentication accounts with identity verification will redirect users to the eAuthentication Service to complete the identity proofing process.

Customers may choose to have their identity verified in-person by a USDA Local Registration Authority (LRA) or through an online identity proofing service. Once the identity is verified, customers may use the associated user ID and password to access USDA resources through eAuthentication.

The eAuthentication system is developed and managed by the Office of the Chief Information Officer (OCIO). eAuthentication collects customer information under OMB Control Number 0503-0014, which pertains to WebCAAF.

Supporting Statement

Justification

1.   **Explain the circumstances that make the collection of information necessary.**

Authority for obtaining information from users, as alternatives to traditional paper-based processes, is included in Section 2, (c), of the Freedom to E-File Act (Pub. L. 106-222), the Government Paperwork Elimination Act (GPEA, Pub. L. 105-277), the Electronic Signatures in Global and National Commerce Act (E-SIGN, Pub. L. 106-229), E-Government Act of 2002 (H.R. 2458), GRAMM–LEACH–BLILEY ACT (Pub L. 106-102., 502-504), and the President's Management Agenda . Conducting online transactions necessitates processes for authenticating and authorizing online users and completing transactions with an electronic equivalent to traditional ink signatures. The information collected from the eAuthentication web site enables the electronic authentication and authorization of users to conduct official business with USDA through web-based applications.

2.   **Indicate how, by whom, how frequently, and for what purpose the information is to be used.**

The USDA eAuthentication Service provides public and government businesses single sign-on capability for USDA applications, management of user credentials, and verification of identity, authorization, and electronic signatures. USDA eAuthentication obtains customer information through an electronic self-registration process provided through the eAuthentication web site. This voluntary online self-registration process applies to USDA Agency customers who request access to USDA web applications and services utilizing eAuthentication via the Internet. Registrants are able to self-register online from the eAuthentication web site, located at www.eauth.usda.gov, for an eAuthentication account. An eAuthentication account has an associated user ID and password which enables the electronic authentication of users. A user will then have access to authorized resources without needing to re-authenticate within the context of a single Internet session. The user ID and password and permissions associated with an account are what authenticates and authorizes a user to access a requested USDA resource.

A customer **eAuthentication account <u>without</u> identity verification,** also considered anonymous, provides limited access to USDA web site portals and applications that have minimal security requirements. eAuthentication accounts, without identity verification, do not allow the customer to conduct official business transactions with the USDA via the Internet. The account may be used, for example, to customize a web portal page, obtain general information about a specific USDA agency, or participate in public surveys for a USDA agency. A registrant can self-register for an eAuthentication account directly from the USDA eAuthentication web site located at www.eauth.usda.gov.

A customer **eAuthentication account <u>with</u> identity verification** provides the ability to conduct official electronic business transactions with the USDA via the Internet, such as entering into a contract with the USDA and submitting forms electronically via the Internet with a USDA

agency. A customer trying to access an application requiring a higher identity assurance will be directed to the eAuthentication Service for identity proofing. The customer is prompted to provide their home address, city, state, country, zip code, telephone number, and date of birth. The customer can select one of two identity proofing methods 1) In-person through a Local Registration Authority (LRA) or online using a USDA identity verification service provider. If the online identity proofing method is selected, the social security number is required and is entered at the same time as the other additional data. It is estimated to take a customer three (3) minutes to provide the additional information necessary for identity proofing.

> In-Person Identity Proofing:
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> If the customer selects the in-person method, the customer must visit a USDA Service Center and present a government issued photo ID to a trained Local Registration Authority (LRA), who confirms the customer's identity and updates the eAuthentication account as being identity proofed. It is estimated to take a customer sixty (60) minutes to drive to a local USDA Service Center and complete the identity proofing process.
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> Online Identity Proofing:
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> For the online identity verification method, a social security is required and is entered at the same time the other data is the eAuthentication Service makes web service calls to the online identity verification service and displays the questions received from the web service calls to the customer. The customer must answer the questions correctly, within a threshold, in order to be successfully identity proofed. It is estimated it takes customers 10 minutes to complete the online identity verification process. The web service updates the eAuthentication account as being identity proofed.

Certain personal information collected through the online self-registration process is conditionally shared with USDA agencies in order to integrate USDA resources with the eAuthentication service. Sensitive data such as passwords are never shared. Systems receiving eAuthentication Service data are required to have an approved Authority to Operate (ATO) in effect. In addition, the eAuthentication Service requires an agency signed Memorandum of Understanding that describes the data handling requirements (e.g., storage, transfer) for ad hoc data requests. For agencies receiving data through automated data connections, ICAM requires an Interconnection Security Agreement (ISA) with the target system.

3. Use of information technology.

All technology used in the eAuthentication System is compliant with NIST Special Publication 800-63-3: *Digital Identity Guideline*. Users can obtain an eAuthentication account solely through the online self-registration form. There is not a paper-based form available to register for an eAuthentication account. Users must access the eAuthentication web site to complete and submit the self-registration form electronically. The eAuthentication Service uses the registrant's email address as the eAuthentication userid, which is entered by the registrant during the eAuthentication account self-registration process.

Each eAuthentication account contains an assigned userid (the registrant's email address) and password that was created by the user. In addition, each account contains associated roles or permissions, given by administrators, which allow the user to request access to USDA applications. The user ID and password and permissions associated with an account are what authenticates and authorizes a user to access a requested USDA resource.

The eAuthentication Service complies with the E-Government Act by eliminating the need for traditional paper-based forms. In addition, eAuthentication provides full electronic reporting capabilities as required in the E-Government Act. Also, the use of a national credit bureau complies with the Gramm-Leach-Bliley Act.

4. **Describe efforts to identify duplication.**

The eAuthentication Service, by nature, eliminates the need for USDA agencies to create authentication processes within their applications, which saves the agencies development and maintenance time and money. Not all USDA customers need an eAuthentication account, only those who want to access USDA websites that are protected by eAuthentication. Therefore, the eAuthentication Service cannot obtain customer information from other systems. There is also no alternate USDA enterprise service for authenticating and authorizing users electronically.

5. **Methods used to minimize burden on small businesses or other small entities.**

The reporting requirements in this information collection package will not affect small businesses. The online self-registration form is identical for all applicants irrespective to their volume or business. Therefore, no additional burden is being placed on businesses of any particular size.

6. **Consequence if the information collection is not conducted or is conducted less frequently.**

The information collected through the online eAuthentication self-registration form is only collected once. If the information is not ever collected, the user must continue to conduct business with USDA through the existing paper-based processes.

7. **Special Circumstances.**
- **requiring respondents to report information to the agency more often than quarterly;**
- **requiring respondents to prepare a written response to a collection of information in fewer than 30 days after receipt of it;**
- **requiring respondents to submit more than an original and two copies of any document;**
- **requiring respondents to retain records, other than health, medical, government contract, grant-in-aid, or tax records for more than three years;**
- **in connection with a statistical survey, that is not designed to produce valid and reliable results that can be generalized to the universe of study;**
- **requiring the use of a statistical data classification that has not been reviewed and approved by OMB;**
- **that includes a pledge of confidentiality that is not supported by authority established in statute or regulation, that is not supported by disclosure and data security policies that are consistent with the pledge, or which unnecessarily impedes sharing of data with other agencies for compatible confidential use; or**
- **requiring respondents to submit proprietary trade secret, or other confidential information unless the agency can demonstrate that it has instituted procedures to protect the information's confidentiality to the extent permitted by law.**

None of the special circumstances shown above are applicable. There are no other special circumstances.

8. **Federal Register notice, summarization of comments, and consultation with persons outside the agency.**

A Notice to request the renewal of this information collection was published in the Federal Register on February 20, 2020, (Vol 85. No. 34, pg. 9721). No comments were received.

Individuals outside the USDA were not directly consulted; however, feedback was provided through word-of-mouth and casual interactions. For instance, customers stated the in-person identity proofing process is inconvenient and time intensive. In response, an on-line identity proofing solution was implemented. In another example, customers stated the account registration was cumbersome. In response, the account creation and registration process was updated, streamlined, and provides a better customer experience.

9. **Explain any decision to provide any payment or gift to respondents.**

The agency does not provide any payments or gifts to respondents for information collected through the USDA eAuthentication web site.

10. **Confidentiality provided to respondents.**

All information collected will be treated as confidential in compliance with the Privacy Act and Freedom of Information Act.

The current System of Record Notice (SORN), USDA eAuthentication Service, was published on January 26, 2017, (Volume 82, No.50, page 8503).

11. **Questions of a sensitive nature.**

The information requested through the eAuthentication web site is not considered of a sensitive nature (such as religious beliefs, sexual behavior and attitude, etc.).

12. **Estimate of burden.**

USDA agency customers register for an eAuthentication account. Registrants submit a one-time online self-registration form and respond to a confirmation email to obtain a registered eAuthentication account. For eAuthentication accounts, with identity verification, additional information is required from the customer.

The USDA eAuthentication Service has been operating since October 2003. Between October 2016 and October 2019, there was a monthly average of 8,642 new eAuthentication accounts, without identity verification, and an additional 2,891 eAuthentication accounts with identity verification. The new account growth for the eAuthentication Service is expected to remain steady with a similar number of new accounts annually as in previous years, which is 103,704 (8,642 registrants * 12 months) for eAuthentication accounts without identity verification. Similarly, eAuthentication identity proofed accounts is estimated to be 34,692 (2,891 registrants * 12 months) annually. Collectively, ICAM estimates 138,396 (103,704 + 34,692) new accounts will be created annually, eAuthentication without and with identity verification respectively. There are no entries on the online form that requires any applicant to develop new information not already known by the applicant.

To complete the online self-registration, it is estimated to take 3 minutes to read, understand, and complete the online self-registration form. The estimated annual public burden cost is $98,424.95 which is based on the annual burden of 5,185.2 hours (103,704 responses * 3 minutes) multiplied by an average hourly rate of $18.98 per customer. The average hourly rate is

the sum of average hourly wage of $14.49 plus average hourly fringe benefits of $4.49 (31% of wage). The average hourly wage is based on the mean hourly rate of Farming, Fishing, and Forestry Occupations in the Agriculture, Forestry, Fishing and Hunting sector of the May 2018 National Industry-Specific Occupational Employment and Wage Estimates. This hourly wage estimate is provided through the Bureau of Labor Statistics and can be directly accessed at https://www.bls.gov/oes/current/oes_nat.htm#45-0000.

To begin the identity proofing process, it is estimated to take 3 minutes to read, understand, and complete the additional fields required for identity proofing, which is an annual public burden cost of $32,926.00.

- For online identity proofing (OIDP), it is estimated to takes 3 minutes to answer the online knowledge-based questions provided by a USDA identity verification service provider. Using an estimate of 85% of customers use the online method (34,692 responses * .85 = 29,488), 29,488 responses will utilize this identity verification method. It is estimated that the annual public burden cost for OIDP method is $27,987.10. 1,474.41 hours (29,488 responses * 3 minutes) times an hourly rate of $18.98 per customer equals $27,987.10.

- For identity verification through an LRA, it is estimated to take 1 hour to travel to the nearest USDA Service Center. Using an estimate of 15% of customers traveling one (1) hour to an LRA (34,692 * .15), 5,204 responses will utilize this identity verification method. 5,204 hours (5,204 * 1 hour) multiplied by an hourly rate of $18.98 per customer equals $98,778,01.

13.   **Total annual cost burden to respondents.**

The information collection and reporting burden does not impose any capital or start-up costs to respondents. The information is already known by respondents and there are no ongoing or follow-up reporting requirements that impose any costs but for the one-time collection.

14.   **Provide estimates of annualized cost to the Federal government.**

The estimated cost to the Federal government is $143,309.06. This estimate is based on the cost of gathering, maintaining, retrieving, and disseminating the data. Despite fully supporting electronic information collection, additional time is sometimes needed to assist customers who are having difficulties. The estimated cost is based on 30% of the responses requiring assistance of 10 minutes (10 minutes/60 minutes = 0.17). 138,396 *.30 = 41,519 responses needing assistance. 41,519 responses * .17 = 6,919.80 hours. The average of the GS-5 (step 5) through GS-7 (step 5) salary income is $43,076.80 per year or $20.71 per hour ($43,076.80 / 2080). Fringe benefits cost an additional $7.66 per hour (37% of hourly wage). Base salary plus fringe benefits is a total of $28.37 per hour. 6,919.80 hours per year * $28.37 = $196,314.73).

15.   **Reasons for changes in burden.**

The total number of responses increased from 135,596 in 2016 to 173,088 in 2019 as a result of new USDA programs being offered through the Farm Bill and other service offerings. Even though the responses increased by 37,492, the total annual burden hours decreased from 28,941 in 2016 to 13,598 in 2019.

The number of eAuthentication accounts, without identity verification, decreased and the eAuthentication accounts, with identity verification, increased due to the convenience of the online identity verification process. When the only option for identity verification was through a

LRA, often customers would not complete the identity verification step due to the inconvenience of having to travel to a LRA. The introduction of online identity proofing in 2016, made it easy to verify their identity from the comfort of their own home.

Factors that Increased:

The agricultural customer hourly wage increased from $13.59 in 2016 to $14.49 in 2019 as well as the hourly federal staff wage, resulting in an increase of the annual public burden cost and the annualized cost to the federal government, respectively. Fringe benefit costs was also added that were not previously reported.

Factors that Decreased:

The account registration process was modernized and streamlined for an improved customer experience. The new user interface smoothly steps the users through the registration process and reduced the registration time from 8 minutes to 3 minutes, resulting in public burden savings of $163,369.06 annually (5 minutes savings (.083 * 103,704 responses * $18.98 farmer's hourly rate. In addition, the number of customers using the LRA process decreased from 30% in 2016 to 15% in 2019. The overall annual burden cost decreased from $393,310.36 to $258,116.07 resulting in a significant savings of $135,194.29.

The annualized cost to the federal government substantially decreased based on an assumption that only 30% of all users may require assistance rather than every user. In 2016, the annualized federal government cost was $437,520.00. Calculating the cost to the federal government with an estimated 30% users needing assistance, the annualized federal government cost for 2019 is $196,314.73. Saving the federal government $241,205.27.

16. **Outline plans for tabulation and publication.**

The information collected is not planned for publication. It will only be used to provide the customer authorized access to applications.

17. **Reasons display of expiration date for OMB approval of the information collection is inappropriate.**

The USDA eAuthentication Service is not requesting an exemption for the expiration date.

18. **Exceptions to the certification statement identified in Item 19 of the OMB 83-I form.**

There are no exceptions to the certification statement.