

**Justification for Non-Substantive Changes for Social Security Benefits Applications:  
Form SSA-1: Application for Retirement Insurance Benefits  
Form SSA-2: Application for Wife's or Husband's Insurance Benefits  
Form SSA-16: Application for Disability Insurance Benefits  
Internet Claim (iClaim) Application Screens  
Internet Appointment (iAppointment) Application Screens  
20 CFR 404.310-404.311, 404.315-404.322, 404.330-404.333, 404.601-404.603, and 404.1501-  
404.1512  
OMB No. 0960-0618**

**Background**

The Social Security Administration (SSA) provides online enrollment for individuals who wish to apply for Medicare during their Initial Enrollment Period (IEP). For individuals applying for Medicare for the first time, SSA's Internet-based iClaim system (OMB Control #0960-0618) provides the option to enroll in Medicare Part A and Part B. However, iClaim is not an option for those individuals already enrolled in Medicare Part A who are interested in enrolling in Part B during the General Enrollment Period (GEP), or a Special Enrollment Period (SEP). Rather, SSA directs those Medicare Part A enrollees to visit an SSA field office, or to mail their completed Form CMS-40B, Application for Enrollment in Medicare Part B (Medical Insurance) [OMB Control #0938-1230], to their local field office. If the individuals are applying for Medicare Part B due to a loss of employment, or group health coverage, SSA and the Centers for Medicare & Medicaid Services (CMS) would also require them to complete Form CMS-L564, Request for Employment Information (OMB Control #0938-0787).

Due to the current COVID-19 situation, SSA needed to close field offices to the public and is subsequently experiencing extremely large call volumes. Further, there is a possibility that the situation may become so severe that the delivery of mail could be disrupted for extended periods. These COVID-19 related issues could prevent individuals from enrolling in Medicare Part B in a timely manner. CMS is currently working with SSA to offer relief from certain requirements and timeframes for Medicare Part B. One of these relief options is to update the CMS-40B and CMS-L564 forms to include an online application option for beneficiaries to complete their enrollment request through the SSA's website.

As the current COVID-19 situation expands, Medicare beneficiaries may have increased trouble accessing SSA by phone, or submitting an application via mail. Therefore, we are requesting the approval of a temporary Internet version, which combines the CMS-40B and CMS-L564 applications. Approval of these new Medicare Part B application screens is critical to ensuring beneficiaries have all available options to submit their enrollment requests during this time.

SSA is requesting the approval for these screens as we had the means to create them quickly for CMS. We are asking for approval under the OMB Control # 0960-0618, as iClaim is approved under this Control number. While we realize that these new screens combine two CMS-owned applications, we also understand the need to obtain approval for these COVID-related changes as quickly as possible. In addition, we also note that 0938-0787 is currently pending OMB approval, which means CMS would not currently be able to submit any new documentation

under their ICR for 0938-0787. We ask OMB to approve these screens quickly so that the public can enroll in Medicare Part B using these new screens as part of a special enrollment period.

**Revisions to the Collection Instruments**

- **Change #1:** CMS and SSA are allowing online enrollment for Medicare Part B through a new Internet version of Forms CMS-40B and CMS-L564.

**Justification #1:** CMS and SSA believe that it will benefit the public to allow Internet-based enrollment for these two collections which are currently only available through paper-based forms. The new Internet screens ask the same questions as the paper version.

- **Change #2:** CMS and SSA modified Forms CMS-40B and CMS-L564 to fit the scope of an online application.

**Justification #2:** To ensure a user-friendly Internet application which will be easy for the public to use, we made some minor adjustments to the forms to better suit them to an Internet-based platform. These revisions do not change the questions in any way; however, in some instances, we needed to adjust the order of the requested information. We made these changes for the Internet version to allow for a more logical progression for the individual using the online format.

**Revisions to the Burden**

SSA and CMS believe that allowing electronic enrollment will have little impact on the currently approved submission. We estimate that there will be no change in the total number of respondents for the CMS-40B and CMS-L564; however, we estimate that the overall burden for Control No. 0938-0787 will decrease for employers, as they will not need to complete the online submission. The online version gives the applicant the option to provide the employer proof, which alleviates the need for the employers to respond. Therefore, the total time to complete the CMS-40B as well as the CMS-L564 sections A and B increases the total burden for the applicants, but decreases the total burden for the employers. Please see our chart below showing the burden decrease for the use of the new Medicare Part B online application:

<b>Modality of Completion</b>	<b>Number of Respondents</b>	<b>Frequency of Response</b>	<b>Average Burden Per Response (minutes)</b>	<b>Estimated Total Annual Burden (hours)</b>	<b>Average Theoretical Cost Amount (dollars)*</b>	<b>Average Wait Time in Field Office (minutes)**</b>	<b>Total Annual Opportunity Cost (dollars) ***</b>
CMS-40B – Paper Version 0938-1230	390,000	1	15	97,500	\$25.72*	24**	\$6,520,020***
CMS-L564 Section A - Applicants – Paper	5,000	1	5	417	\$25.72*	24**	\$62,165***

Version 0938-0787							
CMS-L564 Section B - Employers – Paper Version 0938-0787	5,000	1	15	1.250	\$65.30*	24**	\$212,225***
Medicare Part B Online Application - Applicants Only – Internet Version	10,000	1	30	5,000	\$25.72*	0	\$128,600***
<b>Totals</b>	<b>410,000</b>			<b>104,167</b>			<b>\$6,923,010***</b>

\* We based these figures on average U.S. worker’s hourly wages (based on BLS.gov data, [https://www.bls.gov/oes/current/oes\\_nat.htm](https://www.bls.gov/oes/current/oes_nat.htm)), and Compensation, Benefits, and Job Analysis Specialist hourly wages fringe benefit wages (based on BLS.gov data, <https://www.bls.gov/oes/current/oes131141.htm>).

\*\* We based this figure on the average FY 2020 wait times for field offices, based on SSA’s current management information 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 **104,167** burden hours (reflecting SSA management information data), which results in an associated theoretical (not actual) opportunity cost financial burden of **\$6,923,010**. SSA and CMS do not charge respondents to complete our applications.

Once we receive OMB approval for these COVID-related screens, we will transfer them back to CMS for use under OMB Control #s 0938-1230 and 0938-0787.