

**Justification for Non-Substantive Changes for Social Security Benefits Applications:  
Internet Appointment (iAppointment) Application Screens  
Enhanced Leads and Appointment System (eLAS) Screens  
20 CFR 404.630-404.632, 404.703 and 416.340-416.350,  
OMB No. 0960-0618**

**Justification for Non-Substantive Changes**

**Background:**

The Social Security Administration (SSA) administers benefits under Title II (Retirement, Survivors and Disability); Title XVI (Supplemental Security Income); and Title XVIII (Medicare Part A) for which an individual may be eligible. Individuals have three options for filing an application:

- Our online Internet application (applies to Retirement Insurance, Disability, and Medicare benefits),
- Paper application and mail, or
- Through an interview with an SSA technician.

Individuals may go directly to SSA's website to file for Retirement Insurance, Disability Insurance, and Medicare benefits online. However, sometimes an individual is unable to file online, or chooses not to do so after beginning the process. If an individual is unable to file online, that individual receives a message through our Internet system that provides an option to schedule an appointment to file for the benefits with their local SSA office. Individuals who elect to schedule an appointment receive a message that directs them to the Internet iAppointment system. Through iAppointment, individuals can enter the system through our current Internet screens where they can schedule an appointment with a technician to file an application.

For individuals who contact SSA via phone or in office regarding filing for benefits, SSA explains their filing options. If the individuals request an in office or telephone interview with an SSA employee, the technician schedules an appointment with the individuals for a specific time and date. If an individual states they intend to walk into their local field office, or requests to complete a paper application, the technician documents the individual's intent to file to prevent a loss of benefits. The date the individual contacts SSA with intent to file for benefits is referred to as the protective filing date. The SSA technician can use the protective filing date as the date of the application provided the individual files an application within six months for Title II benefits, or within sixty days for Title XVI benefits. Once the technician schedules an appointment, the technician sends a confirmation notice that includes the appointment date, time, and location, as well as information that includes the date by which the individual must file the application in to use the protective filing date as their application filing date.

In addition, once individuals begin receiving benefits, they may need to meet with an SSA technician regarding a post entitlement event such as an overpayment, suspension of benefits, or a representative payee issue. To better serve the public, SSA provides

appointments for these post entitlement events.

Currently, SSA uses an in-office calendar system which is part of the old Modernized Claims System to record these appointments, and we have no set call script for technicians to follow, so the conversation with the individuals is free-form, and it is possible that they are not recording all of the same information we currently request through iAppointment. However, as part of our IT Modernization plans, we are incorporating an Intranet-based version of the iAppointment screens for use by SSA technicians both in the field offices and call centers. This new system, the Enhanced Leads and Appointment System (eLAS), will interact with iAppointment directly to ensure we always record the same information whether an individual requests an appointment through our Internet screens, or via telephone. In addition, eLAS will interact with the new web-based claims system SSA is currently designing through our IT Modernization efforts. eLAS will be a non-public facing system that allows SSA employees in the field offices, workload support units, and teleservice centers to schedule appointments and document an individual's intent to file using a specific script and asking the same questions to each individual (which we do not do using our current system).

Since these new eLAS screens mirror our current iAppointment screens, we are asking for approval via Change Request. These new, web-based Intranet screens will also share the old legacy screens, as we expect those to serve as a backup in the event of web failure. We expect these new screens will streamline business processes; avoid compatibility and network issues; mitigate vulnerability issues; and increase productivity by taking the advantage of the many state of the art features of web based applications. We also expect these new screens will help us to serve the public better as we will ask the same questions over the phone as we ask using iAppointment.

To ensure we can better help the public, we intend to implement these new screens on **June 20, 2020**. This will also allow us to have the new eLAS screens in place for testing with the new IT Modernization of our claims system.

#### **Revisions to the Collection Instruments – iAppointment (eLAS Screens):**

- **Change #1:** Upon OMB's approval, the eLAS will serve as another modality for collecting an individual's intent to file (i.e., to establish a protective filing date), and for making appointments for in-office or telephone service.

#### **Justification #1:**

Due to the modernization of our claims systems, SSA needs to provide a web-based system that can share information among other new or upcoming web-based system applications which are part of our IT Modernization plans.

- **Change #2:** We are increasing the developmental costs for this collection by \$18,801,169.00 to account for the creation and implementation of eLAS.

**Justification #2:** The overall estimated developmental cost for creating the eLAS is \$18 million. This estimate provides for the multi-year effort, and accounts for the database and computational services work, as well as the overhead costs, based on what we know today.

- **Change #3:** While the eLAS system in and of itself does not collect information directly from members of the public, it does inherit Privacy Act Statement controls from other business processes. Since eLAS integrates with iAppointment, and iClaim is the initial step in initiating an iAppointment, we are modifying the Privacy Act Statement for iClaim. We will provide the newest version of the Privacy Act Statement at the time when the agency collects information from a member of the public, which may result in the scheduling of an appointment.

**Justification #3:** SSA’s Office of the General Counsel, Office of Privacy and Disclosure is conducting a systematic review of the iClaim Privacy Act Statements to determine if the Privacy Act Statement accurately covers the collection, which may result in a claim or an appointment.

- **Change #4:** We are revising the annual burden estimates for this information collection to include 5,157,780 eLAS respondents. The average burden per response will remain ten minutes, as the eLAS screens request the same information as the current iAppointment screens. The chart below shows the increased burden information for the appointment scheduling aspect of this information collection request:

**iAppointment and eLAS Screens**

Modality of Completion	Number of Respondents	Frequency of Response	Average Burden Per Response (minutes)	Estimated Annual Burden (hours)	Average Theoretical Cost Amount (dollars)*	Average Combined Wait Time in Field Office or for Teleservice Center (minutes)**	Total Annual Opportunity Cost (dollars) ***
iAppointment	17,621	1	10	2,937	\$25.72*		\$75,540***
eLAS	5,157,780	1	10	859,630	\$25.72*	21**	\$68,540,019***
<b>Totals</b>	<b>5,175,401</b>			<b>862,567</b>			<b>\$68,615,559***</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))

\*\* We based this figure on the combined average FY 2020 wait times for field offices (approximately 24 minutes per respondent) and teleservice centers (approximately 17 minutes per respondent), 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 increase for this ICR due to including eLAS is **859,630** burden hours (reflecting SSA current management information data for telephone and in office requests for scheduled appointments), which results in an updated total annual burden for scheduling appointments of **862,567** hours. The associated theoretical (not actual) opportunity cost financial burden for appointments is a total of **\$68,615,559**. SSA does not charge respondents to complete our applications.

**Justification #4:** We are providing annual burden estimates for the eLAS information collection. We did not previously report teleservice center and in-office requests for scheduled appointments as we did not ask the same, or similar, questions to the public for those interactions, and did not have a standardized script for those interactions (thus, they were not subject to the PRA). Since eLAS will standardize our telephone services and in-office requests for scheduled appointments, it will increase the total burden for this collection by **859,630** hours.

- **Change #5:** We are adding a calendar for post-entitlement appointments.

**Justification #5:** We are adding a calendar for post entitlement appointments to ensure individuals are able to meet with an SSA employee on time-sensitive post entitlement issues.

We will implement the new eLAS screens upon OMB approval. As stated above, we are asking for OMB approval before our **June 20, 2020** implementation date, to ensure we can begin the next phase of our IT Modernization for the claims system.