

**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 mySNO application (OMB # 0960-0777) provides users with the ability to select their Special Notice Option (SNO) preference from within the authenticated my Social Security portal. We obtained OMB approval for the mySNO screens via Change Request to 0960-0777, which OMB approved on 1/15/20. In that Change Request, we explained that we would update our electronic access to accommodate the mySNO users once we were ready to implement the mySNO screens. Since we intend to implement these screens in June, we are increasing the burden for electronic access to accommodate the mySNO users (see our burden chart below).

Additionally, we aim to improve the overall user experience by offering the public the *my Social Security* Benefit Entitlement Center (BEC) Spouse Calculator from the *my Social Security* landing page. This calculator will allow authorized users the ability to calculate their benefits as a spouse or for a spouse. The *my Social Security* BEC Spouse Calculator will have two new major capabilities that will allow our users to obtain spousal benefit estimates:

- Users will be able to obtain a monthly benefit estimate as a spouse by entering a month and year of election and their spouse’s primary insurance amount (Spouse’s Retirement benefit amount at full retirement age). This benefit estimate is plotted on a line graph, where they can compare their spouse’s benefit estimate against what their own retirement benefit estimate would be.
- Users will also be able to obtain a monthly benefit estimate of what their spouse would receive on their own earnings record, by entering their spouse’s date of birth and spouse’s month of election.

Just as with our current Retirement Estimator Calculator, we do not retain the results, and we ask for no additional personal information once the authenticated user accesses the *my Social Security* landing page.

Customers who fail out of electronic access registration either can visit a local Field Office (FO), or call the National 1-800 Number. If they choose neither option, they are unable to continue using SSAs electronic services. To provide an additional option for our customers, The United States Postal Service (USPS) and SSA have partnered to develop a pilot program to offer an alternative in-person proofing process for customers who cannot create a *my Social Security* account online. We have been developing this program over the last several months and it will

run for a limited time, effective August 22, 2020 through mid-December 2020. Customers who reside in select zip codes and who fail electronic access registration will have the option to identity proof at a participating USPS post office. USPS will offer the pilot in two distinct metro areas; DC metro and Southern California. We selected these sites and prioritized them, based on SSA customers' failed online attempts; the number of zip codes within given areas; and the average distance for individuals from a participating USPS in-person proofing facility. Customers who successfully identity proof at a post office will receive an activation code via email to finish account set up online. Customers who identity proof unsuccessfully at a post office, will receive instructions via email referring them to the FO for assistance.

This is a pilot program and we are exploring enhancements for future releases and expansions if it is proven beneficial to both agencies and our customers. Prior to any subsequent releases or expansion, we will obtain OMB approval.

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 offering an in-person identity proofing option with participating United States Postal Service (USPS) locations.

Justification #1: This enhancement improves both security and usability for our users. It also gives our users more locations in addition to our SSA Field Offices (FO) to get identity proofed for an account if they cannot do so online.

- **Change #2:** We are increasing the burden for the mySNO (Special Notice Option) application (0960-0777).

Justification #2: This application allows users the ability to select their Special Notice Option preference from within the authenticated *my Social Security* portal. We are increasing the burden now in anticipation of implementing the OMB approved mySNO screens.

- **Change #3:** We are adding a new application within the Benefit Entitlement Center (BEC) titled the Spouse Calculator.

Justification #3: This calculator will allow authorized users the ability to calculate their benefits as a spouse or for a spouse. This calculator will not retain any information, and we will not ask for additional personal identifying information from respondents to use this calculator.

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 02/21/2020.

The data below is based off our actual Management Information (MI) data for fiscal year 2019. 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 10,161 registrations due to mySNO, and 516,473 for the Spouse Calculator offered on our [my Social Security](#) landing page. We are only increasing our number of respondents for these two new applications from the last OMB approval. Since the packages are less than six months apart, we cannot estimate any additional changes at this time. 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)*	Average Wait Time in Field Office (minutes)**	Total Annual Opportunity Cost (dollars)***
Internet Registration	6,923,048	1	8	923,073	\$25.72*		\$23,741,437***
Internet Sign-Ins	53,985,814	1	1	899,764	\$25.72*		\$23,141,930***
Intranet Registration (RCS)	2,295,983	1	8	306,131	\$25.72*	24**	\$7,873,689***
Advance Designation of Representative Payee (Previously submitted and approved by OMB on 02/21/2020.)	950,000	1	6	95,000	\$25.72*		\$2,443,400***

USPS Pilot Intranet Registration (RCS)	2,400	1	8	320	\$25.72*	24**	\$32,922***
Totals	64,157,245			2,224,288			\$57,233,378***

* We based this figures on average U.S. citizen’s hourly salary, as reported by Bureau of Labor Statistics data (https://www.bls.gov/oes/current/oes_stru.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 **2,224,288** burden hours (reflecting SSA management information data), which results in an associated theoretical (not actual) opportunity cost financial burden of **\$57,233,378**. 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.