

**Justification for Non-Substantive Changes for SSA-455
Disability Update Report
20 CFR 404.1589-404.1595 and 416.988-416.996
OMB No. 0960-0511**

Background

Our current process for the SSA-455, Disability Update Report, requires SSA to send copies of the paper form which contain prefilled information and a bar code (containing PII for the recipient) to those specific Supplemental Security Income (SSI) recipients who need to fill out the form annually according to the Continuing Disability Review schedules established through our regulations. Once the SSI recipient completes the form, we ask them to send it back to our Wilkes Barre Direct Operations Center using the self-addressed, stamped envelope we provide.

Due to the in-house staffing restrictions we must follow under the current COVID-19 situation, we are unable to allow enough staff members in our Direct Operations Center to process all of the SSA-455 submissions in a timely fashion that we receive from Supplemental Security Income recipients to whom we have sent the form. To alleviate the need for in-person staff to scan the SSA-455 submissions into the electronic folders; we are implementing a telephone interview process which utilizes verbal attestation in lieu of a wet signature to obtain the information we need on the SSA-455, and allow us to continue processing the Disability Update Report as needed per our regulations.

We will only use this telephone interview process during the current COVID-19 situation, and will discontinue collecting the information in this manner once the COVID situation ends.

Justification for Non-Substantive Changes to the Collection

We are making the following interim changes to the information collection due to COVID-19 restrictions:

- **Change #1:** We will allow SSA staff to complete the form via a personal telephone interview process with the SSI recipient. Staff will use the following directions and call scripts for the telephone interviews:

When a beneficiary or representative payee contacts the FO for help with filling out the SSA-455, the technician should:

1. Access form SSA-455 using the electronic fillable version in InForm (SSA's Intranet-based Forms library).
2. Read the following start of the interview attestation script for telephone interviews at the beginning of the interview:

“During this interview, we will ask you questions that will be used to process your/or name of claimant's (application /amendment/ redetermination/name of form) for (benefits/Medicare). At the end of the interview, we will ask you to confirm the truthfulness of your answers under penalty of perjury and we will record your response. You should be aware that you can be held legally responsible for giving us false information.”

3. Complete the interview over the phone with the beneficiary to complete the form.
4. Read the following end of the interview attestation script for telephone interviews at the conclusion of the interview:

“You will receive a printed copy of the information being used to process your/or name of claimant's (application/amendment/redetermination/name of form) to retain for your records. Do you understand that you must review all of this information carefully and let us know right away if anything needs to be corrected OR if any of the information changes?”

5. Save the form as a PDF on the desktop or P drive (System drive).
6. Open the PDF in Adobe and select “Fill and Sign” on the right-hand side of the form. This opens a new menu bar at the top of the form.
7. Select “Sign” Annotate the “Signature Page” on the forms with “ATTEST,” along with the interviewer's name and office code after obtaining attestation from the claimant using the following script:

“Do you understand that the information you have provided will be used to process your/or name of claimant's (application /amendment/ redetermination/name of form)? Do you declare under penalty of perjury that this information is true and correct to the best of your knowledge?”

Justification #1: Since we cannot process these forms quickly enough with the small number of staff who are in our Direct Operations Center building, we believe allowing an alternate means for collecting this information will allow us to continue collecting it, and enable us to continue the process for CDRs as required under our regulations. SSA recognized that there was a need to offer a service option to SSI recipients who require assistance with the form but are currently unable to come into the office, due to offices being open for limited services during the pandemic. In addition, this new method will alleviate the overwhelming number of forms which our Direct Operations Center receives, allowing us to process those items we do receive in a timelier manner.

- **Change #2:** Under this new interview process, we will utilize the alternative

signature method of allowing for verbal attestation of the SSA-455, rather than requiring a wet signature.

Justification #2: The only modification we are making to the form is to accept verbal attestation as an alternative signature, and not requiring a wet signature from the respondent. This will allow us to collect the information as needed and process the information we collect on the SSA-455 through the new telephone interview.

Since we are making no changes to the content of the form, and will be using the actual paper forms to obtain the information through the new telephone interview process, we expect no change in the current burden information for this collection.

As stated above, we will discontinue this interview process once the COVID-19 situation ends.

Future Plans:

In light of the current COVID-19 restrictions, we are also working on a second COVID-related method for collecting this information which we will submit to OMB once we have finalized it. That new method should allow for electronic transmission of the fillable PDF version of the SSA-455. However, we are not ready to include that here, as we are still working on the back-end systems for the new process. We will submit a subsequent Change Request to OMB when we are ready to obtain approval for the alternative COVID-related submission process for this ICR.

In addition, we are currently working on a completely electronic version of the SSA-455 which we hope to implement in the future behind the [mySocial Security](#) platform. Our current COVID-related changes are to implement an interim, short-term solution to provide the public with assistance completing this form right now. Once we complete our new Internet-based modality for collecting the SSA-455 information, we will submit it to OMB through the full information collection revision process.