

**Justification for Non-Substantive Changes for
Request for Internet Services-Authentication; 800# Automated Telephone Speech
Technology
OMB No. 0960-0596**

Background

Due to the current COVID-19 situation, SSA must find other ways to assist the public while we are unable to assist respondents within our field offices. To help callers that do not have, or choose not to use, the Internet to conduct their business with SSA, we are deploying a new Telephone Knowledge Change of Address (TKCA) application into the national 800 Number (N8NN) suite of automated telephone services. Previously, we had an automated telephone version for Change of Address; however, we discontinued it as most respondents either changed their addresses in a field office, or through use of our Internet-based, *my Social Security* accounts. The revised TKCA will allow callers who are receiving payments, to change their address or phone number once they authenticate, without any agent interaction. If a caller is not receiving payments, the system will transfer them to an agent for assistance as they cannot self-serve.

We believe that implementing this new application will reduce the call wait time and allow agents to handle calls more complex calls, rather than needing to deal with those items respondents can do on their own through the automated telephone system. SSA will ensure we use anti-fraud measures for this new application, and we will analyze the efficiency of the application to determine if it should stay in place after the pandemic ends.

The new TKCA will not require the respondent to input any new personally identifiable information once they authenticate to use the system. We will not change our current authentication process for the Knowledge-Based authentication we use for the automated telephone system. However, we will include additional anti-fraud processes, such as notifying the caller the last time they accessed the automated telephone system, and making data available for the antifraud team to run reports to find anomalies. We require these items as part of the risk assessment for the new application.

TKCA Flow:

We attached the full call flow (Voice User Interface (VUI)); however, below is a quick easy to follow flow to show this revision:

ID	Caller CoA Condition (IVR)	Language (IVR) (actual language is in VUI)
IVR-COA-1	Ask if caller is receiving benefits	Are you receiving retirement, survivor, or disability benefits?
IVR-COA-2	Caller confirms receiving benefits = No	You must already be receiving benefits to change your contact information. If you're finished, you can hang up.

ID	Caller CoA Condition (IVR)	Language (IVR) (actual language is in VUI)
		Otherwise, hold on and I'll take you back to the Main Menu... --
IVR-COA-3	Caller confirms receiving benefits = Yes	And, is this change for yourself?
IVR-COA-4	Change is for Self = No	Prompt: [ca260_out_01] Okay. To change the address of another person, they'll need to be with you. If they are not with you then please call back when they are, otherwise hold on while I get someone to help you
IVR-COA-5	Change effective immediately	Do you want this change effective immediately?
IVR-COA-6	Caller change effective = ASAP	Change effective ASAP Go to IVR-COA-8
IVR-COA-7	Caller change effective = No ASAP	Hold on while I get someone to help you.
IVR-COA-8	Change is for Self = Yes: Asks Caller for PII to be authenticated	SSN, FN, LN, Other LN (optional), DOB, MMN, POB-City, POB-State, last payment Note: For related language see the appropriate sections under "2.8 KnowledgeBasedAuthentication Dialog" in CARE2020 document.
IVR-COA-9	Authentication = Fail	Sorry, I am having trouble getting access to your records. Hold on while I get someone to help you.
IVR-COA-10	Date of last account access	Once caller passes authentication they will hear IVR-COA-10 then either IVR-COA-11, IVR-COA-12, IVR-COA-13 or IVR-COA-14 then IVR-COA-15. Your last account access was on DD/MM/YYYY
IVR-COA-11	Authentication = Pass but SSN is not receiving benefits (status code 2000)	You must already be receiving benefits to change your contact information. If you're finished, you can hang up. Otherwise, hold on and I'll take you back to the Main Menu
IVR-COA-12	Authentication = Pass but SSN is not eligible to	Hold on while I get someone to help you.

ID	Caller CoA Condition (IVR)	Language (IVR) (actual language is in VUI)
	use this IVR application (status code 2001 or 2002)	
IVR-COA-13	Authentication = Pass but SSN has pending changes. (status code 2003)	It looks like you currently have changes pending. Hold on while I get someone to help you.
IVR-COA-14	Authentication = Pass and Multiple Addresses on record	This will change the address on all your eligible records, is that okay?
IVR-COA-15	• Authentication = Pass	What would you like to change - your 'Address,' your 'Phone Number,' or 'Both?'
IVR-COA-16	Ask for Current Address	To begin we will need your current address Note: Nuance will use address dialogue module.
IVR-COA-17	Confirm Address	Interaction language for current address: Confirm complete address with caller.
IVR-COA-18	<ul style="list-style-type: none"> • Caller selects address only or both, Continue • Caller selects phone only then go to (IVR-COA-25) 	Address module
IVR-COA-19	Change Address = Yes	Prompt: [ca0310_out_01] Okay. Address
IVR-COA-20	Ask caller for zipcode	What is the 5-digit zip code for the new address?
IVR-COA-21	Zip code is validated	I got the city and state information from your zip code. Now I need just your street address, PO box or rural route number. For example, you could say 1 2 3 Main Street

ID	Caller CoA Condition (IVR)	Language (IVR) (actual language is in VUI)
		West, or PO box 12345. Go ahead and say your address.
IVR-COA-22	Street info confirmed with user	System confirm the new street
IVR-COA-23	Confirm entire address	System confirms the new address
IVR-COA-24	Caller confirms whether address is resident address	Is the address you provided your resident address? Go to IVR-COA-30
IVR-COA-25	Phone Change: Caller selects both or phone only option	
IVR-COA-26	Asks the caller if they want to remove their phone number or change it.	Do you want to 'Change' or 'Remove' your number?
IVR-COA-27	Ask caller which Phone number and type to change or remove	For our records, what type of number is this - 'Home,' 'Work,' 'Cell,' your 'Attorney's' number, or 'Something Else.'
IVR-COA-28	Caller selects phone number to change and provide changes	Starting with the area code, what's your new telephone number?
IVR-COA-29	Caller provides phone number and System confirms	That phone number is...
IVR-COA-30	Submitting change request	Prompt : [ca0435_out_01] Great. Hold on while I submit this. (It may take a few seconds...) --
IVR-COA-31	Request is submitted	Prompt : [ca0440_out_01] All set! Your information change has been sent for processing which may take up to three business days.
IVR-COA-	Call completed	Prompt : [ca0440_out_05] If you're done, feel free to hang up. Otherwise...

ID	Caller CoA Condition (IVR)	Language (IVR) (actual language is in VUI)
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Revisions to the Collection Instrument

- **Change #1:** We are increasing the burden for this collection to accommodate the respondents for the new TKCA application.

Justification #1: We expect the addition of the TKCA application will result in an increase in respondents using our automated telephone system, which will, in turn, increase the number of respondents who authenticate using our Knowledge-Based Authentication.

SSA plans to implement these changes by the end of September 2020. As part of the new Commissioner’s Digital Transformation Plan, we are required to revise several of our telephone applications and our back end systems to make them more efficient; help the public self-serve more often; free up our call service representatives to handle calls that are more complex; and create backend systems that are not silos so that less resources are required for maintenance. The current COVID-19 situation has made this need even more urgent so that we can assist as many callers as possible.

Estimates of Public Reporting Burden

We expect this action will increase the current public reporting burden by approximately 33,333 hours. The chart below shows the updated burden information (we placed the Telephone Change of Address increase on a separate line to make it easier to see; however, these respondents will complete the same Telephone Requestor information as shown on the second line of the chart):

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)**	Total Annual Opportunity Cost (dollars)***
Internet Requestors	2,903,902	1	2.5	120,996	\$25.72**	\$3,112,017***
Telephone Requestors	9,795,655	1	4	653,044	\$25.72**	\$16,796,292**
Telephone Change of Address	500,000	1	4	33,333	\$25.72**	\$857,325***
*Screen	1			1		

Splash (on hold)						
Totals	13,199,557			807,373		\$20,765,634** *

* We previously reduced the burden to a one-hour placeholder for Screen Splash because we are not currently using this automated telephone application. We are working on ways to strengthen and secure our online and automated telephone services, to streamline service delivery, and to improve customer service by not duplicating verification data before we implement it again.

** 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).

*** 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 **807,373** burden hours (reflecting SSA management information data), which results in an associated theoretical (not actual) opportunity cost financial burden of **\$20,765,634**. SSA does not charge respondents to complete our applications.