

**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

The Social Security Administration's (SSA) Continuing Disability Review (CDR) process is the process by which SSA determines if individuals who are receiving disability benefits continue to meet the program's medical eligibility requirements. Since 1993, SSA has asked the public to complete CDRs through full medical reviews (OMB No. 0960-0072), or through our Disability Update Report (CDR Mailer), approved under OMB No. 0960-0511.

SSA is required by law to periodically review both Title II Disability Insurance and Title XVI Supplemental Security Income (SSI) disability cases. SSA's timeframe established to conduct a CDR depends on the expected likelihood of medical improvement. The SSA-455, CDR Mailer, is a cost effective process that allows us to meet our Congressional requirements.

SSA normally sends the CDR Mailer to recipients who, on the basis of statistical analyses called profiling, indicate a low probability of medical improvement. Form SSA-455 is a self-help mailer designed to solicit key information from disabled recipients about their medical conditions and recent treatment for same. "Recent" usually means within the last two years. The mailer also asks for information about recent education or training, and recent attempts to (return to) work.

Under normal conditions, SSA uses a private contractor who prints and releases the SSA-455 mailers according to a schedule prepared by the Division of Continuing Disability Reviews Support (**DCDRS**). The CDR Mailers are returned to the **Wilkes-Barre Direct Operations Center (WBDOC)** by USPS mail, as we include a pre-paid envelope along with the SSA-455 for the respondents to use when returning the forms to SSA.

In addition, under our current business process, SSA requires technicians to complete an intensive clerical review of the physical SSA-455 forms prior to scanning. Due to the COVID-19 emergency, we do not have adequate staffing levels at WBDOC to process the returned mailers.

Under our normal process, the WBDOC staff takes the following actions, as appropriate

- processes change-of-address actions;
- processes name corrections;
- remails undeliverable mailers (once);
- controls unsigned forms for signatures;
- does direct telephone contact (**DIRCON**) to resolve unanswered questions;
- analyzes responses and attachments;
- codes the forms; and
- scans and keys the returned mailers.

Currently, due to the COVID-19 situation, the WBD OC can only work at half the normal capacity. To address the staffing limitation related to COVID -19, we propose creating an online fillable form utilizing Adobe sign technology, as a short term solution. This form will be very similar to the current, fillable Form SSA-455; however, respondents will be able to access it from our website and submit it using Adobe eSign.

This online solution relies on the technicians reviewing images of the PDF form. Current technology enables WBD OC staff to complete their clerical review virtually. However, this process normally involves staff members to scan or download the forms prior to the clerical review. After which the technicians review images of the mailer forms along with any attachments. Our new process will work in a similar fashion; as we will allow our web-based system to scan the fillable PDFs into the same back-end system our WBD OC staff currently use to review the images of these forms virtually. Thus, this new process is not reliant on staff being physically in the facility to complete the review of the actual paper forms.

Using the fillable PDF version of the SSA-455, the images of the online mailer will be sent to WBD OC for processing. The WBD OC will be able to complete their clerical review, then code and key the form by cross referencing available records. They will obtain the additional data needed for transmission to the DCD RS for the decision logic process from existing SSA records.

The decision logic will continue to provide an analysis of the mailer responses and coding to determine the outcome of the mailer. Under this new system, every mailer will still be coded by the technician. One code tells the decision logic about the physical characteristic of the form. For example based on this code the logic will know if the form has extensive remarks or attachments. The decision logic also considers the combination of responses received on the form to determine the final outcome.

SSA will only use this new submittable PDF 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 the public to complete and submit the fillable SSA 455 via an online application located on the www.ssa.gov website.

Justification #1: We believe allowing an alternate means for collecting this information will allow us to continue collecting the information, and enable us to continue the process for CDRs as required under our regulations. SSA recognized that there was a need to offer an alternative service option 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 online process, we will utilize the Adobe e-signature technology.

Justification #2: The only modification we are making to the form is to accept electronic signatures, 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 online process.

SSA will implement this new, fillable and submittable PDF upon OMB's approval. Since we are making no changes to the content of the form, we expect no change in the current burden information for this collection.