

**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 this information collection request, 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 (**DCCDRS**). 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.

Under normal conditions, when completed SSA-455s are received at the WBDOC, and SSA requires technicians to complete an intensive clerical review of the physical SSA-455 forms prior to scanning.

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.

Due to the COVID-19 emergency, we do not have adequate staffing levels at WBD OC to conduct the above-described physical clerical review of the SSA-455 forms prior to scanning. For mailed-in forms, SSA will now scan the forms prior to conducting the clerical review electronically. Additionally, as described below, SSA is developing a new optional online method for collecting the information on the SSA-455 that will help reduce paper SSA-455 processing.

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 have created 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 online using the Adobe eSign web application.

With this new modality for submission, respondents will be able to enter their responses into structured data fields on www.ssa.gov. After completing the form, the respondent will receive an email with instructions for completing the digital signature and submitting the form. Once the form is submitted, the structured data is converted into a static PDF that is electronically transmitted to SSA's eClerical system. This is the same system to which paper SSA-455s that are mailed to the WBD OC will be scanned into, and from this point forward electronically-submitted and paper-scanned SSA-455s are processed identically. This begins with the paper-scanned and electronically-submitted PDFs being intermingled within a single file directory within eClerical. Because the images of the SSA-455 are electronic PDFs, these can be reviewed by SSA technicians remotely.

For all SSA-455s, regardless of if they are submitted electronically or via the mail, the SSA technicians will now conduct the clerical review electronically. Ultimately, the SSA-455s will be analyzed by the Automated Decision Logic System (ADL), as described below. However, the ADL cannot optically process missing information or added documentation, so first the technician must conduct a visual review of the electronic PDF. The technician will assess the overall completeness of the information provided on the SSA-455, whether the respondent gave any free-form remarks, and whether any additional documentation was appended to the form. Upon completion of the clerical review, the technician will apply an alpha-numeric code to the top of the static PDF to reflect the results of the clerical review.

Once the review is complete and the code has been applied, the technician will submit the PDF image to the ADL. The ADL is software programmed to optically analyze the SSA-455, including the code added by the technician, to make a determination on how to proceed with the SSA-455.

SSA will only use this new submittable PDF process during the current COVID-19 situation. Once the current emergency ends, we will reevaluate the submittable PDF process and determine whether we continue to use it or discontinue it.

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.