

**Justification for Non-Substantive Changes for Forms SS-5, SS-5-FS
Application for a Social Security Number (SSN) Card, the Social Security Number
Application Process (SSNAP), the Online Social Security Number Application Process
(oSSNAP) and the Internet SSN Replacement Card (iSSNRC) Application
20 CFR 422.103 - 422.110
OMB No. 0960-0066**

Background

The Social Security Administration allows a person to file an application for an original or replacement SSN card through one of the following modalities: mailing a completed paper Form SS-5; using various electronic applications (e.g., Enumeration at Birth, the Internet Social Security Number Replacement Card), if eligible; or completing an in-office interview.

Due to the current COVID-19 situation, SSA needed to close field offices to protect the public and our employees. While we are still conducting limited in-office interviews by appointment only, when available, for individuals with a dire need to file for an original SSN card, in general, we are not able to conduct most of the in-office interviews at this time. Individuals who need to apply for a replacement SSN card must either use iSSNRC, or mail the completed form SS-5 along with their supporting documentary evidence.

To accommodate some applicants during the current COVID-19 situation, SSA plans to use agency-approved commercial, Internet-based software (e.g., Microsoft Teams Video Teleconferencing) for conducting video-teleconference interviews for U.S. Citizen Replacement SSN cards. Since these commercial video teleconferencing modalities are not secured, we will inform respondents verbally of this fact and ask them if they would like to continue the teleconference interview before we begin.

Since we intend to use the video teleconferencing software to conduct our normal interview process, we will make no changes to the SSNAP screens to implement this change in modality. We do not expect this change will affect the burden for our personal interviews.

We will evaluate the usefulness of this commercial teleconferencing software once the current COVID-19 situation ends to determine if we will continue to offer this alternative once we can reopen our offices and conduct in-person interviews through our normal business process.

Revision to the Collection Instrument

- **Change #1:** SSA will allow certain members of the public to file a replacement SSN card application via a video teleconference interview.

Justification #1: SSA will use agency-approved commercial off-the-shelf software to conduct a video teleconference for U.S. citizens age 16 and over. This will allow more applicants to apply for a replacement SSN card while our offices are operating with limited availability.

Revisions to the Burden Estimate

In addition, to enable more respondents to use our iSSNRC Internet-based modality, we reevaluated our criteria to allow individuals who might previously have been denied access due to our old criteria to use the system. For instance, at the inception of the Social Security program, we assigned Social Security Numbers and issued cards based solely on the applicant's allegations and did not require them to furnish any proof or evidence. However, in the 1970s we gradually implemented statutory changes to require applicants to provide evidence to document their allegations. Since those cards issued prior to the implementation of these statutory requirements lack the proof of evidence, we programmed the iSSNRC system not to allow those number holders to use the Internet system as they posed a fraud risk. Since then, we have reevaluated those number holders and determined that many of them pose little or no fraud risk. Since the COVID-19 situation limits our ability to provide in-person help to those individuals to whom we issued cards prior to the statutory changes of the 1970s, we have updated the iSSNRC system to allow them to use the Internet for their requests.

To accommodate for the increase in burden for iSSNRC, and subsequent decrease in burden for SSNAP and other modalities, we are also revising our burden chart for this information collection. Please see our revised burden chart below:

Application Scenario	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) ***
EAB Modality							
Hospital staff who relay the State birth certificate information to the BVS and SSA through the EAB process	3,725,000	1	5	310,417	\$23.74*	0**	\$7,369,300***

iSSNRC Modality							
Adult U.S. Citizens requesting a replacement card with no changes through the iSSNRC	2,100,000	1	5	175,000	\$25.72*	0**	\$4,501,000***
oSSNAP Modality							
Adult U.S. Citizens providing information to receive a replacement card through the oSSNAP+	3,500,000	1	5	291,667	\$25.72*	24**	\$43,509,675***
SSNAP/SS-5 Modality							
Respondents who do not have to provide parents' SSNs	6,630,000	1	9	994,500	\$25.72*	24**	\$93,787,980***
Respondents whom we ask to provide parents' SSNs (when applying for original SSN cards for children under age 12)	190,000	1	9	28,500	\$25.72*	24**	\$2,687,740***
Applicants age 12 or older who need to answer additional questions so SSA can determine whether we previously assigned an SSN	910,000	1	10	151,667	\$25.72*	24**	\$13,262,955***
Applicants asking for a	7,250	1	60	7,250	\$25.72*	24**	\$261,058***

replacement SSN card beyond the allowable limits (i.e., who must provide additional documentation to accompany the application)							
Enumeration Quality Review							
Authorization to SSA to obtain personal information cover letter	500	1	15	125	\$25.72*	24**	\$8,359***
Authorization to SSA to obtain personal information follow-up cover letter	500	1	15	125	\$25.72*	24**	\$8,359***
Totals	17,063,250			1,959,251			\$165,396,426***

* * We based this figure on average Hospital Records Clerks (<https://www.bls.gov/oes/current/oes292098.htm>), and average U.S. worker's hourly wages (https://www.bls.gov/oes/current/oes_nat.htm#00-0000) as reported by the U.S. Bureau of Labor Statistics.

** 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 number of respondents for this modality is an estimate based on google analytics data for the SS-5 form downloads from SSA.Gov.

In addition, OMB's Office of Information and Regulatory Affairs (OIRA) is requiring SSA to use a rough estimate of a 30-minute, one-way, drive time in our calculation of the time burden for this collection. OIRA based their estimation on spatial analysis of

SSA’s current field office locations and the location of the average population centers based on census tract information, which likely represents a 13.97 mile driving distance for one-way travel. We depict this on the chart below:

Total Number of Respondents Who Visit a Field Office	Frequency of Response	Average One-Way Travel Time to a Field Office (minutes)	Estimated Total Travel Time to a Field Office (hours)	Total Annual Opportunity Cost for Travel Time (dollars)****
11,987,250	1	30	5,993,625	\$154,156,035****

****We based this dollar amount on the Average Theoretical Hourly Cost Amount in dollars shown on the burden chart above.

Per OIRA, we include this travel time burden estimate under the 5 CFR 1320.8(a)(4), which requires us to provide “time, effort, or financial resources expended by persons [for]...transmitting, or otherwise disclosing the information,” as well as 5 CFR 1320.8(b)(3)(iii) which requires us to estimate “the average burden collection...to the extent practicable.” SSA notes that we do not obtain or maintain any data on travel times to a field office, nor do we have any data which shows that the average respondent drives to a field office, rather than using any other mode of transport. SSA also acknowledges that respondents’ mode of travel and, therefore, travel times vary widely dependent on region, mode of travel, and actual proximity to a field office.

NOTE: We included the total opportunity cost estimate from this chart in our calculations when showing the total time and opportunity cost estimates in the paragraph below.

The total burden for this ICR is **1,959,251** burden hours (reflecting SSA management information data), which results in an associated theoretical (not actual) opportunity cost financial burden of **\$319,552,461**. SSA does not charge respondents to complete our applications.