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Justification for the Non-Substantive Changes for
Social Security Administration's Public Credentialing and Authentication Process
20 CFR 401.45 & 20 CFR 402
OMB No. 0960-0789

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Background

Since we established it in May of 2012, SSA uses the Social Security Administration's Public Credentialing and Authentication Process (hereafter-called "eAccess") to provide a secure, centralized gateway to Social Security's public-facing electronic services. We currently allow users to register both through our eAccess Internet process, and through a personal interview process using the Registration and Customer Support (RCS) screens for in-person or telephone interviews.

As of December 5, 2020, we are making additional changes to enhance our system and ensure continued security for our customers. We will consider all newly registered online accounts what we used to identify as 'extra security' accounts. Currently we have two optional procedures for 'extra security':

- The traditional method where we require users to answer a financial question to upgrade their account and they receive an upgrade code via USPS mail, and
- The new method, which we included in our September 2020 Change Request, where we added a state identification document (driver's license, state identification card, or learner's permit) to the account, and sent an activation code via USPS mail, or digitally via SMS text or email.

After December 5, 2020, SSA will consider all accounts 'extra security' accounts. We will allow customers to choose how they will receive their activation code (USPS mail, or digitally via SMS text or email), and the activation code will activate the entire account (not just the extra security feature). To aid with this, we will also ask all customers registering online to register with state identification documents. Registration with these documents gives us a higher level of assurance in the customer's identity. If a customer does not have these documents, we will continue to allow them to answer the out of wallet questions and financial questions instead. Along with this enhancement, we will no longer allow customers to remove extra security from their accounts.

As always, we continue to update authentication requirements for *my* Social Security customers to ensure continued security and to enhance the system. We are also making the above changes to allow the agency to move towards compliance with the National Institute of Standards and Technology (NIST) Special Publication 800-63-3 guidelines in accordance with M-19-17.

We will implement these new, non-substantive revisions on **December 5, 2020**. Therefore, we are asking for OMB's approval of these revisions by **November 27, 2020**, to ensure we can implement on time.

Revisions to the Collection Instrument

- **Change #1:** We will no longer allow customers to remove extra security from their accounts.

  Justification #1: The extra security provides us with a higher level of confidence in the customer's identity; therefore, it is to their benefit to keep it in place.

- **Change #2:** We will now consider all newly registered accounts what we used to identify as extra security accounts.

  Justification #2: This verification provides us with a higher level of confidence in the customer's identity.

- **Change #3:** We will now offer the state ID registration options (photo upload or manual entry) to all customers.
  Justification #3: This enhancement improves both security and usability for our users. We are making these changes to allow the agency to move towards compliance with the National Institute of Standards and Technology (NIST) Special Publication 800-63-3 guidelines.

- **Change #4:** We are updating the Terms of Service (TOS) screen to include new language.

  Justification #4: This language change clarifies that we allow individuals who need to obtain assistance to do so.

Note: We added feedback badges for the ForeSee survey questions to multiple screens to obtain screen level feedback from our customers. The Department of the Interior previously obtained approval for these survey questions and cleared them under OMB #1090-0008. We only mention this here, as we have ensured that the approved ForeSee survey questions will appear as per the Department of the Interior's approved ICR.

These revisions will not affect the current burden for this collection.

As mentioned above, we will implement these revisions on **December 5, 2020**.