

**Justification for Non-Substantive Changes for SSA-1696
Claimant's Appointment of a Representative
20 CFR 404.1707, 404.1720, 408.1101, 416.1507, and 416.1520
OMB No. 0960-0527**

Background

We are revising our recent OMB approval to release an online fillable and submittable version of the SSA-1696 through a secure portal as we encountered a minor programming issue with the submittable version. To ensure we obtain OMB's approval for this minor revision prior to release, we are moving out implementation date for this service to **March 6, 2021**. Therefore, we are asking for OMB's approval as soon as possible to ensure we can begin using this new version with the public by our new implementation date.

Justification for Non-Substantive Changes to the Collection

- **Change #1:** We previously proposed to mask the claimant's Social Security Number (SSN), the Representative ID (RepID) and the Employer Identification Number (EIN), as an added risk mitigation. However, during pre-release testing, we determined that the fields were still masked when SSA's processing system received the completed form, and our system cannot unmask them. However, with this information missing, staff cannot process the form.
- **Justification #1:** Since all emails will be password-protected, we will no longer mask this information. The representative and claimant can only access the form using the password the representative creates and the completion of the form is on a secure portal. In addition, we note that, if the respondents (both representatives and claimants) were to complete the paper version, none of these sections would be masked for them, and both parties would see this information on the form. Therefore, this change mirrors the current paper process for this form. For these reasons, and to ensure SSA will have all of the information we need to process the forms, we will not mask the SSN, RepID and EIN fields on the new fillable and submittable version of the form.

SSA will implement the e1696 upon OMB's approval. As mentioned above, we intend to implement this new electronic version of the form on **March 6, 2021**.