

**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**

**Revision to the Collection Instrument**

- **Change #1:** We are expanding the universe of respondents who 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 using our SSNAP modality from age 16 and over to age 12 and over.

**Justification #1:** We already conduct in-person SSNAP interviews with U.S. citizens ages 12 and older. We are simply expanding the use of commercial, Internet-based software to conduct the interviews to include ages 12-15.

In September 2020, OMB approved the use of commercial, Internet-based software for SSNAP interviews for respondents age 16 and over who produce a valid State ID or driver's license. We will still require a valid State ID or driver's license for this collection, the only change is to expand the universe of respondents to include ages 12 and over. Since we already conduct these interviews in-person using SSNAP, this expansion will not change the burden for this collection.

- **Change #2:** As it has already been established with our existing modality of completion for SSNAP transactions, we obtain the SS-5 information from respondents either via in-person visits with face-to-face interviews, or in person interviews using the field office's video teleconferencing equipment over secure channels. We are currently expanding the use of video teleconferencing to include requests for replacement cards for non-U.S. citizens, and to allow U.S. citizens to request changes to the Social Security Number (SSN) Cards and not just replacement cards.

**Justification #2:** We currently use the SSNAP video teleconferencing interviews for U.S. citizen replacement cards only, and require a SSNAP face-to-face interview for any changes to the SSN cards. However, this expansion will allow us to conduct VSD interviews as needed for changes to SSN cards, and will also allow us to conduct video teleconferencing interviews for non-U.S. citizens. Since we currently conduct SSNAP face-to-face interviews for both changes to SSN cards, and for non-U.S. citizens to request replacement cards, we expect no change in the burden for this minor revision in the type of interview we conduct.

We will implement these minor IT Mod expansions of currently OMB-approved modalities in March 2021. Therefore, we are requesting a quick approval for IT Mod purposes.