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

Background

Since we established it in May of 2012, SSA uses the Social Security Administration's (SSA) 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.

We are currently making additional changes to enhance our system and ensure continued security for our customers. We will make the financial questions optional for most customers. This will allow customers the choice of adding extra security to their accounts once they have answered a financial question successfully, but will not prohibit them from proceeding with a standard account if they successfully verify other information.

Additionally, we will now offer a new application called Representative Payee Medicare Replacement Card (RpMRC) behind eAccess, and accessible from the *my* Social Security landing page. This application is an online tool that gives *my* Social Security users who are individual representative payees a way to request a replacement Medicare card for any beneficiary they represent. Once the representative payee uses eAccess to log into their *my* Social Security account, and places the request online through RpMRC, SSA sends the Medicare card to the address on file within 30 days.

As always, we continue to update digital identity 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 OMB M-19-17.

Revisions to the Collection Instrument

- **Change #1:** We will allow customers the choice of adding extra security to their accounts by answering a financial question. The extra security feature will be optional.

  Justification #1: This gives customers the option to add an additional layer of security to their *my* Social Security accounts. This enhancement improves both security and usability for our users.

- **Change #2:** The Representative Payee Medicare Replacement Card (RpMRC) application will be available to access within customers' *my* Social Security accounts.

Justification #2: We are continuously providing more options for our customers to handle business and personal affairs online.

- **Change #3:** Additionally, we are making the following minor changes to screens:

  o On the Sign In Create Account page, we are removing the page title "Sign In or Create an Account"; we are adding in other sign in options (like the previously approved ID.me) along with a link "About External Websites" which explains ID.me; and we are making the "Create New Account" button the primary button on the page.

  o On the You Can Add an Extra Level of Security page, we are adding "To add Extra Security, we need to confirm your identity using financial information" and we added a "More Info" link to explain that requirement; we also added a radio button "No thanks. I don't want to add Extra Security at this time"; and we added a Credit Card option, and support text under the Credit Card option stating "We will not charge your credit card."

    ▪ We added the More Info link to open as a lightbox, and included the text for the More Info on a separate page in the attached screen package.

  o On the Please Create Your Account Details page, we removed the "Available" hint from the Username field.

  o On the Create Your Account Details page, we removed the "Enter Username (Message will show until the Next button is selected)" message from the error messages.

  o On the Privacy and Security page, we replaced the language "Can I apply in person?" with interim language explaining that SSA has currently suspended face-to-face service to the public. Once we reopen offices to the public, we will remove this new language, and replace it with the old language

  o On the Please Choose How to Verify Your Identity page, we added a second radio button "Input your ID information Provide the issuing state and ID number"

  Justification #3: We are making these changes to provide better usability for our customers.

Estimates of Public Reporting Burden

We are adjusting the reporting burden to this information collection, because we expect additional customers to register and access the website for the additional services we will offer on our *my* Social Security landing page. OMB approved the current burden estimate on 01/31/2021.

The data below is based off our actual Management Information (MI) data for fiscal year 2020. We use different modalities to collect the information, via the Internet and the Intranet. We estimate an additional 12,500 registrations due to RpMRC offered on our *my* Social Security landing page. Since we submitted the last burden change less than six months ago, we cannot

estimate any additional changes at this time. We estimated the number of minutes for completion by averaging the "time-on-task" figures we obtained from our usability testing.

See chart below with the updated figures:

Modality of Completion	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)***
Internet Registration	6,739,857	1	8	898,648	$25.72*		$23,113,216***
Internet Sign-Ins	74,431,021	1	1	1,240,517	$25.72*		$31,906,098***
Intranet Registration (RCS)	5,081,050	1	8	677,473	$25.72*	24**	$17,424,614***
Representative Payee Medicare Replacement Card Application (RpMRC)	12,500	1	8	1,667	$25.72*	24**	$42,867***
Totals	**86,264,428**			**2,818,305**			**$72,486,795***

* We based this figure on average U.S. citizen's hourly salary, as reported by Bureau of Labor Statistics data (https://www.bls.gov/oes/current/oes_stru.htm).

** We based this figure on the average FY 2021 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 total burden for this ICR is **2,818,305** burden hours (reflecting SSA management information data), which results in an associated theoretical (not actual) opportunity cost financial burden of **$72,486,795**. SSA does not charge respondents to complete our applications.

<u>Future Plans</u>

Due to the agile nature of our projects, we expect to move more applications to our *my* Social Security landing page, which users access through the electronic access authentication. At this time, we are still finalizing our IT modernization plans for these changes. We expect to submit another change request within six to nine months to request approval for additional updates to the system, and potentially, update the burden again to include more users if we are able to move more applications to our *my* Social Security landing page.