

**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 Online Social Security Number Application Process (oSSNAP) is a combined Internet and Intranet application that allows certain applicants for a Social Security number (SSN) replacement card to apply by completing a prescribed Internet application journey online and submitting the required evidence by mail or in person at a Social Security office. In September 2020, we received OMB clearance to use oSSNAP for U.S. citizen applications. As part of our IT Modification process, we are preparing to expand the use of oSSNAP for non-citizen applications. In addition, we are enhancing the process to make it more user friendly for the respondents.

We hope to implement these IT Mod revisions upon OMB's approval.

Revision to the Collection Instrument

- **Change #1:** We are expanding the universe of respondents who use oSSNAP to include non-citizens requesting an original Social Security number card.

Justification #1: Currently, non-citizens can only apply for an original SSN card through an in-office interview. During the in-office interview, one of our technicians starts and completes the application through the Social Security Number Application Process (SSNAP). This expansion will allow noncitizens to start their application online and complete a shortened application process in-office.

- **Change #2:** We are changing the way oSSNAP presents questions from all at once to a progressive style.

Justification #2: oSSNAP will allow certain respondents to request an original and replacement card. As such, the respondent will need to answer questions progressively in order to continue on the appropriate path of questions (original or replacement). This change simplifies and improves the customer experience.

- **Change #3:** We are adding three questions at the beginning of the application.
 - Are you 18 or older? You must be 18 or older to fill out this application.
 - Do you have a U.S. mailing address? This could include Fleet Post Office [FPO], Army Post Office [APO] & Diplomatic Post Office [DPO] addresses.
 - Does the individual for whom you are applying already have a Social Security Number (SSN)?

Justification #3: We currently ask these questions in our Internet iSSNRC pathing. We will ask these screening questions to ensure an applicant is eligible to use oSSNAP and, if so, direct the applicant down the appropriate path (original or replacement card). This change improves the customer experience, ensuring that the applicant is not answering unnecessary questions.

Burden Estimate

We do not expect any changes in the current burden estimates, as a result of the oSSNAP universe expansion. We believe the estimated number of replacement card applications started using the oSSNAP modality will decrease due to COVID-related SSA office closures and limited in-office appointments. This is because applicants may not wish to mail in their evidence document(s) to complete the SSN card process for fear the document(s) may get lost (or they cannot do without the document, e.g. driver's license). Because of that decrease, we expect the projected increase in the number of original applications started using oSSNAP for non-citizens will keep the totals for the oSSNAP modality as they currently are in the burden chart. If we see an unexpected change in the burden, we will update our burden figures through a future Change Request.