Justification for Non-Substantive Changes to
Form SSA-821-BK: Work Activity Report – Employee
20 CFR 404.1520(b), 404.1571-404.1576,
404.1584-404.1593, and 416.971-416.976
OMB No. 0960-0059

Background

The Social Security Administration (SSA) uses Form SSA-821-BK to collect employment information to determine whether individuals worked after becoming disabled and, if so, whether the work is substantial gainful activity (SGA). We use the information to make a determination of eligibility for disability payments. Specifically, we use Form SSA-821-BK to obtain information from individuals to evaluate initial Supplemental Security Income (SSI) and Social appeals that involve work issues.

On July 14, 2021, OMB approved our request to implement an online fillable and submittable version of the SSA-821-BK, the SSA-821-APP, which utilizes *Adobe Sign* technology to accept and process an electronic signature (eSignature). The SSA-821-APP online version mirrors the paper version and provides respondents with an online service option as an alternative to mailing or faxing the form to the servicing office. Respondents initiate the online version from our website and electronically complete, sign, and submit it using the *Adobe Sign* web application. Use of the *Adobe Sign* web application does not present any added burden on respondents. Respondents are not be required to download and install the application locally on their device, nor will they have to pay any subscription or licensing fees.

The SSA-821-APP modality allows respondents to enter their responses into structured data fields on the online SSA-821-APP screens within the *Adobe* platform by following a secure link that Adobe Sign sends to the email address the respondent provides. The respondent receives an email from *Adobe Sign* with a secure link to the form and instructions for how to complete, electronically sign (eSign), and submit the form using this online service. Upon submission, the online SSA-821-APP electronically transmits an image of the completed form to SSA's WorkTrack application for processing by the servicing office. The servicing office reviews the information and follows policies and procedures to make the SGA determination.

Previously, we required respondents to create a password to use the submittable modality due to a security issue in the Adobe software we used to create the submittable forms. We added the password feature for the forms to mitigate the risk of loss of PII. Since Adobe resolved that issue, eliminating the risk, we are removing the password feature entirely for our single-signer forms. Removing the password provides a better customer experience for our users by eliminating the creation of a temporary credential with no password support (i.e., the customer creates a password that cannot be reset if lost or forgotten). We have concerns that asking respondents to create a temporary password for each single-signer form will create confusion

with our agency's enterprise credentials. In addition, we are removing the language related to password creation from the landing page and the Adobe emails the customer receives, as the respondent will no longer need to create a password. We are making no changes to the form itself; however, the respondent will no longer receive prompts to enter a password. Instead, the respondent will complete the form in a single session and have the opportunity to save a copy for their records once they sign and submit the form.

We are submitting this IT Modification as a non-substantive change request to remove the password requirement from the submittable Portable Document Format (PDF) for Form SSA-821-APP, Work Activity Report – Employee. We intend to implement this change on <mark>August 14, 2021</mark>.

Revisions to the Collection Instrument for the Online Modality

- **Change #1:** We are removing the password requirement from the submittable PDF version of this form.

  Justification #1: Since Adobe resolved the issues with their format eliminating the risk of PII loss which caused us to require a password to protect PII, we are removing the password feature entirely for our single-signer forms.

- **Change #2:** We are removing the language related to password creation from the landing page and the Adobe emails the customer receives.

  Justification #2: Since the respondent will no longer need to create a password to use this form, we are removing this language.

- **Change #3:** We are removing the prompts for the respondent to create a password.

  Justification #3: Since the respondent will no longer need to create a password to use this form, we are removing these prompts.

SSA intends to implement these minor revisions to remove the password requirement on <mark>August 14, 2021</mark>, or upon OMB's approval.