

**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**

On March 8, 2021, with OMB’s approval, we released a new service to allow representatives and claimants to complete, sign, and submit an SSA-1696 notice of appointment online through the *Adobe Sign* platform. Through the portal the representatives and their claimants can submit the form electronically with no personal contact. We set this up as a two-step process the representatives must initiate. The representatives provide their own email addresses and the claimant’s email address and creates a password. Then the representative completes the parts of the form with personal information and submits the partially completed form. The *Adobe Sign* system notifies the claimant by email of the pending document, and once the claimant completes the second step and submits the signed document, the system automatically routes the document to our internal field office work processing system. The *Adobe Sign* system helps expedite the process and gives representatives and claimants flexibility. As before, we continue to accept submissions of appointment notices via mail, eFax, or uploaded through our filing portals and [Electronic Records Express](#) (OMB No. 0960-0753). The link to the e1696 is located on our website at [www.ssa.gov/representation/](http://www.ssa.gov/representation/). We announced and marketed the service following release in March 2021.

Now we are revising our previous OMB approval to address a limitation in the *Adobe Sign* platform to ensure data confidentiality and protection. We are making changes to the final email the system sends to the claimant with a link to access the completed form. Currently, the email tells the respondent to click on the link (the hyperlinked words “Social Security Administration”) if the respondent has forgotten the password; however, since the link leads the respondent to an unmonitored mailbox, and *Adobe Sign* is currently unable to change this language, we are making a change to the email the respondent receives if they click on the link. The revision will create an auto-respond email (from an unmonitored mailbox) which instructs the individual to start a new form, if the individual is the representative; or to contact the representative if the respondent is the claimant. The change will also allow us to add a direct link to a survey “How are we doing?”

We have set an **October 9** release date for this change, as we noted that we need to alleviate this confusion as quickly as possible. To that end, we are asking for OMB’s approval for this revision as soon as possible to ensure we can meet this deadline.

**Justification for Non-Substantive Changes to the Collection**

- **Change #1:** We are changing the final email the system sends to the claimant with a link to access the completed form. We are not removing the *Adobe Sign* generated

link for respondents who have forgotten their passwords; however, if the respondent clicks on the link, the system will generate an auto-respond email (from an unmonitored mailbox) which instructs the individual to start a new form, if the individual is the representative; or to contact the representative if the respondent is the claimant.

**Justification #1:** We previously proposed to protect all emails, incomplete forms, and submissions via password, but have now determined that partially completed form and the link to the completed form were not password-protected. Further, we determined that when the respondent accesses the completed form through the link, if the password is lost or forgotten and the individual follows the relevant link the application, it forwards the submitter to an unattended email box. This link misleads the respondent to think they can reset the password through that process. However, only the representative can provide the password to the claimant, if the representative lost or forgot the password, the representative must start a new submission.

Because we are using a commercial “off-the-shelf” product, *Adobe Sign*, we must work within the features available for the product when we cannot configure the features to meet our needs. Therefore, we are creating a mailbox and installing it behind the link that advises the submitter who lost or forgot the password and cannot access the completed form to click. The system will then send a clarifying email to inform the person that only the representative has the password, and if the password is not available through the representative, then the representative must initiate a new submission.

After the change, the service will be fully protected as it was originally planned. We will maintain a count of how many emails we receive via the password support link.

**Change #2:** We are adding a direct link to a survey “How are we doing?”

**Justification #2:** A benefit of this change is that we can get enhanced data for each submission and invite users to provide feedback via a link in the autoreply. We believe this survey link will allow respondents an easier way to submit any further issues or confusions with the *Adobe Sign* modality. The survey and survey hyperlink are anonymized, that is, the agency does not collect any personally identifiable information (PII) by clicking on the link to complete or by completing the survey.

We will implement these revisions to the e1696 upon OMB’s approval. As mentioned above, we intend to implement this new update on **October 9, 2021**.

These revisions will not change the current burden for this collection.