

**Justification for Non-Substantive Changes for Form e1693
Fee Agreement for Representation before the Social Security Administration
20 CFR 404.1717, 404.1720, 404.1730, 416.1517, 416.1520, and 416.1530.
OMB No. 0960-0810**

Background

On June 25, 2021, we received OMB's approval to release a new service to allow representatives and claimants to submit their fee agreement online through the *Adobe Sign* platform. This new service did not revise the approval process for the fee agreement. Nor did it mandate the use of our SSA-1693 as the only fee agreement document or change any of the other ways which respondents currently submit fee agreements to us. We will continue to accept submissions of fee agreements via mail, eFax, or uploaded through our filing portals and [Electronic Records Express](#) (OMB Control No. 0960-0753). We planned to add the link to the e1693 below the link for the e1696 on our website at www.ssa.gov/representation/ and to announce and market the service following its release.

Submission of the SSA-1693 is a multi-step process because the form requires multiple signers. When using the new e1693, an appointed representative must initiate the SSA-1693 submission through the Adobe Sign platform. The initiating representative provides their own email address, along with the email addresses for the claimant and other co-signer representatives, and then the representative creates a password which must be shared with all other signers. The initiating representative then must complete the parts of the form with their personal information, electronically sign and date the e1693, and submit the partially completed form to the Adobe Sign platform. Once Adobe Sign receives the representative's response, the system then emails the claimant directing the claimant to the partially completed form so the claimant can complete their personal information, and electronically sign and submit it. The system allows other co-signing representatives the initiating representative identified, to also provide their names and signatures. The system notifies all signers via email of the pending document and once all individuals sign and submit the form, it is complete and ready for processing.

However, due to a limitation we found in the *Adobe Sign* platform with respect to the performance of passwords, we halted release plans for the e1693 pending our ability to correct the issue. First, we noted that the link to the completed form was not password protected. Second, we noted that there is a link in the system-generated email for individuals who have lost or forgotten the password which directs the individual to "click here" even though the system is not able to reset the password for them. Rather, the claimant must either obtain the password from the representative and if that is not possible, an appointed representative must start a new form submission to establish a new password. We believe this link, if left as is, will be unnecessarily confusing for the respondents.

To alleviate this problem, we are making changes to this first email we send to the claimant and additional representative(s) with a link to access the completed form. 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 appointed representative; or to contact the appointed representative

if the individual is the claimant or additional representatives who did not create the password. This change will ensure the completed form is password protected and add clarity to the final communication. It will also allow us to add a direct link to a survey “How are we doing?”

To address these issues and ensure data confidentiality and protection, we are revising the currently approved e1693 submittable version of the form. We expect to implement the new e1693 on **October 9, 2021**. Therefore, we are asking for OMB’s timely approval of this IT Modernization Change Request to ensure we can implement this modality by the scheduled date.

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.