

Non-Substantive Paperwork Reduction Act Justification for Non-Substantive Changes to 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

Overview

As the Social Security Administration (SSA) enters a reopening posture which will allow us to increase onsite field office appointments soon, we are updating our COVID-19 screening symptoms questions for in-person appointments. We are seeking OMB approval of a non-substantive Paperwork Reduction Act (PRA) change request for the updated screener. Further information follows.

Background

From the onset of the COVID-19 pandemic in 2020 to the present, SSA has restricted in-person field office visits to limited appointments only, with prioritization of requests for new Social Security Number cards. During that period, we used an initial version of the CDC-suggested COVID-19 screening symptoms questionnaire with people who had these limited field office appointments.

We obtained OMB PRA approval for our use of the questionnaire in 2020. The questionnaire could be completed via telephone or SSA mobile application. Satisfactory answers to the screening questions -i.e., demonstrating that field office visitors did not demonstrate symptoms of COVID-19 and had not been exposed to someone with COVID-19- were required for the appointment to proceed. If the individuals answered yes to any of the COVID screening questions, we offered them the option of completing their interview via video teleconferencing or using our online options, or we offered to reschedule their in-person interview for a later date.

Reopening Posture

Across the Federal government, agencies have begun implementing their reentry plans, and SSA is no exception. SSA's upcoming reentry process will allow for more in-person office visits, both by appointment and ultimately without prior scheduling as well. Our next step is to safely improve access to our services as quickly as possible, especially for those who have had difficulty reaching us during the pandemic. With these adjustments, we expect to see service improvements to the public.

Upon re-entry, we will allow both appointment requests and ultimately walk-in traffic in our field offices (while continuing in the beginning to prioritize appointments and to encourage use of our online and telephone services, which will help with safety measures and allow us to

better plan for the increase of the in-person office visitors). To ensure the health of both the public and our field office employees, we will also begin using the current, updated CDC-approved version of the COVID-19 symptoms screening questionnaire. Specific details about exact expanded reentry dates and field office capacity will be announced publicly as available, but in the interim, we are seeking OMB approval for this updated screening questionnaire now.

Updated COVID-19 Screening Questionnaire

Field office visitors will have the option of completing the updated screener either via telephone or by using SSA's mobile application prior to entering the building. As part of our pre-screening questions prior to scheduling an appointment, we will remind potential visitors of our telephone and Internet options, will explain our mask requirement policy, and will administer a brief screener questionnaire designed to identify COVID-19 symptoms.

For those members of the public who do not schedule an appointment, we have a poster in our field office windows visible from the outside instructing visitors about the need to complete the screening questionnaire and about our masking policies. Regardless of whether one has an appointment or ultimately visits a field office without prior scheduling, satisfactory completion of the screener in advance of entering the building will continue to be a prerequisite for entering the field office.

Specific Revisions to the Collection Instrument

- **Change #1:** SSA is updating our COVID screening questions by making minor changes to conform with current CDC guidance. A comparison of the old and new versions follows at the bottom of this document.*
- **Justification #1:** We want to ensure we are conforming with current CDC questions.
- **Change #2:** SSA is including the COVID screening questions on an updated mobile application for respondents to use as a self-help option just prior to their in-person field office visit.

Justification #2: The mobile application will allow a second option for respondents who would prefer to answer the questions on their own, rather than calling the field office.

- **Change #3:** The mobile application asks one additional new question: "To help us serve you, we need to know if you are Blind, Deaf or Hard of Hearing, or Neither." The mobile application allows respondents to click on the option that works best for each respondent.

Justification #3: We added this question to the mobile application as it helps the field office technicians to accommodate the respondents as needed.

Burden Changes to the Information Collection

When we previously obtained approval for these screening questions, we did not believe they would require any updates to the burden. Since implementation, we noted that there is a time burden on the respondents for answering these questions. In addition, we expect the mobile application to also increase the burden for this collection. The chart below shows our burden estimates for the telephone screening questions and the mobile application screening questions:

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 or for Teleservice Centers (minutes)**	Total Annual Opportunity Cost (dollars)***
VIPr Mobile App	16,554	1	5	1,380	\$27.07*	21**	\$194,200***
Telephone Screener	661,554	1	10	110,259	\$27.07*	21**	\$9,252,607***
Totals	678,108			111,639			\$9,446,807***

* We based this figure on average U.S. worker’s hourly wages, as reported by Bureau of Labor Statistics data (https://www.bls.gov/oes/current/oes_nat.htm#00-0000).

** We based this figure on the average FY 2021 wait times for field offices and teleservice centers, 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.**

In addition, OMB’s Office of Information and Regulatory Affairs is requiring SSA to use a rough estimate of a 30-minute, one-way, drive time in our calculations of the time burden for this collection. OIRA based their estimation on a spatial analysis of SSA’s current field office locations and the location of the average population centers based on census tract information, which likely represents a 13.97 mile driving distance for one-way travel. We depict this on the chart below:

Total Number of Respondents Who Visit a Field Office	Frequency of Response	Average One-Way Travel Time to a Field Office (minutes)	Estimated Total Travel Time to a Field Office (hours)	Total Annual Opportunity Cost for Travel Time (dollars)****
678,108	1	30	339,054	\$9,178,192****

****We based this dollar amount on the Average Theoretical Hourly Cost Amount in dollars shown on the burden chart above.

Per OIRA, we include this travel time burden estimate under the 5 CFR 1320.8(a)(4), which requires us to provide “time, effort, or financial resources expended by persons [for]... transmitting, or otherwise disclosing the information,” as well as 5 CFR 1320.8(b)(3)(iii) which requires us to estimate “the average burden collection...to the extent practicable.” SSA notes that we do not obtain or maintain any data on travel times to a field office, nor do we have any data which shows that the average respondent drives to a field office, rather than using any other mode of transport. SSA also acknowledges that respondents’ mode of travel and, therefore, travel times vary widely dependent on region, mode of travel, and actual proximity to a field office.

NOTE: We included the total opportunity cost estimate from this chart in our calculations when showing the total time and opportunity cost estimates in the paragraph below.

The total burden for the COVID screener questions under this ICR is **111,639** burden hours (reflecting SSA management information data), which results in an associated **theoretical** (not actual) opportunity cost financial burden of **\$18,624,999**. SSA does not charge respondents to complete the COVID screener questions.

We intend to implement these updated screening questions upon OMB’s approval.

Note: For expediency, we are submitting this change request to OMB No. 0960-0066, which will be the first collection affected by the screener. However, as we reopen and began conducting appointments for all types of services, not simply applications related to new SSN cards, we will use the COVID-19 symptoms screener for any type of office visit/application.

***Comparison of Different Versions of COVID Symptoms Screeners:**

Revisions to the COVID Screening Questions for Field Office Visits:

Current Screener	Revised Screener
<p>Let the individual know that you will read a series of questions, and at the end, you will need to know if any, but not which specific ones(s), apply to them.</p>	<p>We collect and use personal information to provide services to the public. We may share information in accordance with the Privacy Act and other Federal laws. For more information visit www.ssa.gov/privacy. [Respondent must click on “I Understand” to move forward]</p>
<p>Do you have any of the following symptoms?</p> <ul style="list-style-type: none"> • Cough or sore throat • Fever (100.4 degrees or higher) • Chills • Shortness of breath or difficulty breathing • Muscle pain or body aches • Headache • New loss of taste or smell • Gastrointestinal symptoms like nausea, vomiting or diarrhea <p>[Respondent must state Yes or No to move on]</p>	<p>Do you have any of the following symptoms?</p> <ul style="list-style-type: none"> • Cough or sore throat • Fever (100.4 degrees or higher) • Chills • Shortness of breath or difficulty breathing • Muscle pain or body aches • Headache • New loss of taste or smell • Gastrointestinal symptoms like nausea, vomiting or diarrhea <p>[Respondent must click either Yes or No to move on]</p>
<p>In the last 14 days, have you:</p> <ul style="list-style-type: none"> • Been diagnosed with COVID-19; • Received instructions to monitor for symptoms or self-quarantine; • Traveled outside the country; • Been within 6 feet of a person who was diagnosed with COVID-19? <p>[Respondent must state either Yes or No to move on]</p>	<p>In the last 14 days, have you:</p> <ul style="list-style-type: none"> • Been diagnosed with COVID-19; • Received instructions to monitor for symptoms or self-quarantine; • Traveled outside the country by means other than land travel, such as car, bus, ferry, or train; or • Been within 6 feet of a person who was diagnosed with COVID-19? <p>[Respondent must click either Yes or No to move on]</p>
	<p>To help us serve you, we need to know if you are:</p>

	<p>[Respondent must click on one:</p> <ul style="list-style-type: none"> • Blind or Low Vision • Deaf or Hard of Hearing • Neither]
<p>If the individual responds “Yes” to any of these questions, the manager may not schedule the interview.</p> <p>If the individual responds “No” to all of these questions, the manager will:</p> <ul style="list-style-type: none"> • Verify the individual’s contact information. • Set up an appointment for the visit. <p>Inform the individual to contact you to reschedule the appointment, or make alternate arrangements for service, if they should experience any of the symptoms you discussed or if they feel ill in any way.</p>	<p>System gives a ticket number and a message that the check-in has been completed if the respondent answers no to the COVID questions.</p> <p>System gives an error message for those who check in too early for their appointment, or after business hours, and asks them to try again close to their appointment time.</p> <p>System generates a message stating that, based on the response, we cannot complete the mobile check-in request for those who answer “yes” to the COVID screening questions, and then asks the respondent to either conduct business with us online or by phone, or set up a new appointment.</p>

Specific revisions to the updated language:

- We added the words “by means other than land travel, such as car, bus, ferry, or train” to the question about traveling outside the country.
- We added the question about blind, low vision, deaf, or hearing impaired to the Mobile app only.