Addendum to the Supporting Statement for the
Emergency OMB Paperwork Reduction Approval
for the Electronic Protective Filing Tool
20 CFR 404.630, and 20 CFR 416.340 - 416.345
OMB No. 0960-NEW

Summary of Discussions with the Public on the Electronic Protective Filing Tool

Background
The Social Security Administration (SSA) held preliminary discussions and usability testing with the public regarding the new online electronic protective filing tool which included both participants answering the questions on their own behalf (i.e., first parties) and third-party advocate groups who answered questions on behalf of potential claimants who volunteered for the usability testing. SSA utilized services from the "Observation-Baltimore" organization, which recruited first party participants for the usability testing. To find third party volunteers, SSA reached out to known external community-based advocates and organizations who have been assisting vulnerable populations.

SSA conducted two rounds of usability testing:

Usability Testing Sessions
Round 1:
- SSA scheduled each usability testing session for one hour.
- We conducted fourteen (14) usability testing sessions with five (5) first party participants and nine (9) third party advocates

Round 2:
- Due to budgeting constraints, we split the Round 2 usability testing into two sessions:
  o For Round 2 Part A, we recruited six (6) first party participants
  o For Round 2 Part b, we recruited six (6) third party advocates

Nature of the Discussion
During the usability testing sessions, SSA asked participants to complete the online tool once on their own without comments or help from the facilitator. We used this method to measure general ease of use, and to give as honest a measurement as possible regarding time to completion. SSA then asked the participants a list of customer satisfaction questions focused on areas such as: overall impressions; ease of use; navigation; clarity of instructions; time to completion; and more specific likes and dislikes regarding the functionality of the tool. We also asked what the participants thought they had accomplished by going through the tool.

After the question-and-answer session, the facilitator and participants went back through the tool together and focused on specific areas of some pages to obtain more detailed feedback. These areas of specificity focused on phrasing of language; usefulness of help text (i.e., on screen information boxes); and a deeper probe into the participants' understanding of specific pages (such as the "Your Information" page and the text on the "Appointment Request Received" page).

Feedback
Overall, the participants' feedback was generally positive, with even the new online electronic protective filing tool's most perceptive critics. The participants noted that it was easy to use, took minimal time to complete, and had clear instructions.

First party participants had the fewest concerns or issues. Third-party advocates, being familiar with the Supplemental Security Income (SSI) and Social Security Disability Insurance (SSDI) programs, had sharper, more insightful observations. Among the list of comments for changing the tool, we found these items to have a high enough frequency rate to necessitate a discussion:

- **Lack of understanding of the tool's purpose:** Due to vague, unclear language, many participants thought they had just finished making an appointment or had applied for SSI benefits for themselves or their client.

- **Confusion over the "Appointment Request Received" screen language:** Participants found the language difficult to understand and left feeling like they were expected to supply documents to someone as soon as possible.

- **The question about the disability onset date had too much specificity:** Third-party advocates noted that many of their clients would not remember the exact day they became disabled, and perhaps not even the month.

- **Density of language for Terms of Service (ToS) and Privacy Act (PA) statement pages:** Participants universally found the amount of text on these pages daunting and distracting. Many asked if they had to read them. When advised they should treat them like they normally would, most skipped past them.

Changes Based on Feedback
SSA incorporated changes to the new online electronic protective filing tool based on user feedback from the usability testing. While we addressed the major concerns, we also made several overall changes for clarity:

- We replaced the ToS and PA statement pages with links to the information on the welcome page. This had the twofold effect of giving the team an opportunity to improve user understanding of the tool while simultaneously finding a solution for the length of the content on the ToS and PA statement pages, as testing participants reported the presented ToS and PA statement pages are too long.

- We changed confirmation screen language to be more straight-forward and clearly explain what the user should expect next.

- We added language (in the form of an information box) for the field collecting a disability onset date acknowledging the difficulty of providing a precise date and giving the user allowance to input their best approximation.

- We included the optional collection of a third-party email address and added functionality to send an email receipt to the user and the potential claimant when email addresses are provided.