



February 28, 2022

Dominic Mancini
Acting Administrator
Office of Information and Regulatory Affairs, OMB
Room 10235, New Executive Office Building
725 17th St. NW
Washington, D.C. 20503

Dear Acting Administrator Mancini,

The Social Security Administration (SSA) is seeking emergency approval from OMB under the Paperwork Reduction Act (PRA) to implement an online tool that enables members of the public to request an appointment to file an application for benefits and establish a protective filing date. Emergency approval of this Information Collection Request (ICR) will enable individuals to express interest in filing for SSI payment and Social Security benefits, while we continue to resolve telephone capacity challenges and begin to reopen our field offices while still protecting the health and safety of the public and our employees. Further details follow.

Background

During the recent COVID-19 pandemic, SSA conducted its services almost exclusively online or by telephone, with limited in-office appointments, to protect the health of both the public and our employees. We took these measures in accordance with relevant Centers for Disease Control COVID-19 pandemic guidance, and to comply with existing Occupational Safety and Health Act provisions regarding workplace safety.

While individuals interested in filing for SSI and Social Security benefits could attempt to reach us by telephone, by mail, and some could file online by completing an Internet application for Social Security benefits (iClaim), which also records an SSI protective filing date. That protected date serves as the application filing date even when technicians later conduct a telephone interview, so long as the claimant files the SSI application within the period specified in our regulatory requirements.

However, because of the conditions we needed to work under the pandemic, SSA noted ongoing service delivery challenges due to technology failures on our National #800 number (N8NN), capacity overload on Field Office telephone lines, mail delivery delays, delays processing incoming paper requests due to necessary workarounds, and limited in-office services generally

Emergency PRA Justification Letter ePFT

for workloads that require in-person service or original evidence. In addition, since the beginning of the pandemic, underserved populations who have historically relied on in-office appointments and service decreased their submissions of Supplemental Security Income (SSI) claims. SSA uses the term “People facing barriers” to refer to these vulnerable populations, which include low-income individuals (especially those over age 65), the homeless, people with limited English proficiency, and disabled children. We recognize that we have an ongoing need to enable electronic services for our most vulnerable populations, those who traditionally receive SSA services by walking into our local field offices, and for those who assist them. This is particularly true for claimants experiencing life circumstances that warrant immediate or expedited services, such as those experiencing homelessness, those diagnosed with a terminal condition, certain disabled veterans, those who need special accommodations, and others.

Based on this unexpected decrease in SSI claim submissions, mostly from people facing barriers, SSA is concerned this population needs more options and flexibility to help them apply for SSI. Our goal in developing this new SSI claims tool is to offer that flexibility, and to make it as easy as possible to complete the process. We are seeking emergency PRA approval because it is important to us to start offering this new tool to everyone, particularly underserved populations, as soon as we can. An emergency PRA approval would facilitate rapid rollout of the tool and would mitigate the delay inherent in the extensive time period of the standard OMB approval cycle. We believe that implementing the new electronic protective filing tool will enable expedited handling in accordance with existing procedures, as well as to provide a service option for people who are unable to come into one of our offices.

Online Electronic Protective Filing Tool; Overview of Emergency ICR

Over the past 22 months, SSA field offices offered limited in-person services by appointment only. While we are planning to resume walk-in services with reentry soon, there is immediate and strategic value to enabling individuals to request an appointment, completing the initial step in the SSI filing process. Adding this option as an online tool will relieve individuals from having to wait for long periods on our N8NN or field office phone lines and will provide the agency with critical information needed to schedule individuals for an appointment to file for SSI and other benefits for which they have potential eligibility.

The new online electronic protective filing tool will be the first step in the journey of applying for SSI, or for Social Security benefits. The information SSA will collect using the new tool is necessary to help SSA determine the type of claim, whether an immediate appointment is needed, and how to contact the applicant or person assisting the applicant to set up an appointment.

The design of the new electronic protective filing tool is responsive and accessible using any device. SSA made the decision to allow the broadest possible access in response to feedback regarding our current iClaim application, which many users struggle to use due to its complexity, and the underlying authentication protocols.

We conducted two rounds of usability testing to help inform the design of the application. Testers included members of the general public and community advocates whose primary

responsibility is to assist individuals applying for SSI. Several testers were from organizations that SSA partnered with through the pandemic to provide referrals, obtain SSI protective filings, and take complete SSI applications.

The new online electronic protective filing tool includes features that enable certain advocates to interact with the agency more easily and assist those who need help most. The tool provides an email confirmation of the protective filing date with key information about next steps in the process. It explains the importance of the protective filing date in plain language with critical information to ensure we receive the application for benefits within the timeframe needed to pay the most benefits.

Information Collection Business Process

When an individual completes the new online electronic protective filing tool screens to request an appointment, the system will route a record of the submission to the nearest servicing field office. The protective filing tool will also send an immediate email to the respondent, and their third-party assistor (if needed) confirming the submission of the request via email, if the respondents provide an email address. To complete that function, the new online electronic protective filing tool routes incoming information to SSA's electronic Leads and Appointment System (eLAS) and downstream systems as part of the SSI application process. From there, a claims specialist reviews the information to determine whether it meets the conditions for an immediate phone call to take an application by phone, or to schedule an appointment for a future date. The claims specialist will schedule the next available appointment for most incoming protective filings and send a mailed appointment confirmation letter to the number holder.

Need for Emergency Clearance

Advocacy groups representing the interests of Social Security claimants and professional organizations from the representative community requested that the agency implement online tools to enable individuals to express interest in filing for SSI without the burden of visiting an office or the delays accompanying a phone or mailed request. This effort also aligns with the recent Executive Order on Transforming Federal Customer Experience and Service Delivery to Rebuild Trust in Government, and other federal guidance on enabling electronic services.

As the agency prepares to reopen to walk-in visitors, we expect many offices will experience a surge in demand for SSI appointments. The new online electronic protective filing tool expands our capacity to serve customers who have Internet access and are able to use our online services, while maximizing in-office appointments for those without access and other people facing barriers.

To expand access to the SSI program and ensure we protect individuals at the earliest date possible for benefits while maintaining the health and safety of the public and our employees, SSA needs the new online electronic protective filing tool in place as soon as possible. The length of the standard Paperwork Reduction Act (PRA) process would hinder our ability to increase our service immediately to aid the vulnerable populations that need this service. Therefore, we are requesting emergency clearance with approval to be granted no later than

03/16/2022. We will publish the requisite Federal Register Notice to invite the public to submit comments if they wish to do so. Given the nature of this information collection request (ICR), our OMB desk officer conveyed to us that PRA approval does not depend on resolution of or response to public comments.

We understand that an emergency PRA approval is effective for only six months. Following the emergency clearance, we will seek full PRA approval for the new online electronic protective filing tool.

We appreciate your collaboration on this important ICR. Please contact me with questions at (202) 358-6030 or at eric.skidmore@ssa.gov.

Sincerely,

Eric Skidmore
Deputy Commissioner
for Legislation and Congressional Affairs