

**Justification for the Non-Substantive Changes for
Request for Internet Services & 800# Automated Telephone Services
Knowledge-Based Verification (RISA-KBV)
20 CFR 401.45
OMB No. 0960-0596**

Background

Knowledge-Based Verification (KBV)¹, one of SSA's authentication methods, allows individuals to access their personal information through our Internet and Automated Telephone Services. SSA asks individuals and third parties who seek personal information from SSA records, or who register to participate in SSA's online business services, to provide certain identifying information. As an extra measure of protection, SSA asks requestors who use the Internet and telephone services to provide additional identifying information unique to those services so SSA can authenticate their identities before releasing personal information. The respondents are current beneficiaries and non-beneficiaries who are requesting personal information from SSA, and individuals and third parties who are registering for SSA's online business services.

Revisions to the Collection Instrument

- **Change #1:** We are removing the Retirement Estimator (RE) Internet application from RISA-KBA.

Justification #1: Under current federal guidance from the National Institute of Standards and Technology, KBV is no longer sufficient for digital services that disclose personal information. We will direct individuals who wish to obtain benefit estimates to the more modern Retirement Calculator service in *my Social Security*, which does not rely on KBV for identity verification.

Estimates of Public Reporting Burden

We are adjusting the reporting burden to this information collection because removing Retirement Estimator will reduce the number of respondents using RISA-KBA.

Based on our actual Management Information (MI) data for fiscal year 2021, we estimate 2.2 million fewer users will try to access RISA-KBA due to the decommissioning of Retirement Estimator. We are updating our burden chart as follows:

Modality of Completion	Number of Respondents	Frequency of Response	Average Burden per	Estimated Total Annual	Average Theoretical Hourly	Total Annual Opportunity Cost (dollars)**
-------------------------------	------------------------------	------------------------------	---------------------------	-------------------------------	-----------------------------------	--

¹ Formerly known as knowledge-based authentication (KBA)

			Response (minutes)	Burden (hours)	Cost Amount (dollars)*	
Internet Requestors	721,795	1	3	36,090	\$28.01*	\$1,010,881**
Automated Telephone Requestors	1,157,833	1	4	77,189	\$28.01*	\$2,162,064**
Totals	1,879,628			113,279		\$3,172,945**

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

** 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.**

Note: We are not updating the burden figures for 0960-0789 (eAccess) at this time, even though it houses our authentication for *my Social Security*, as our current burden figures for 0960-0789 already include the users we expect for the Retirement Calculator (as of the Change Request which OMB approved on 3/30/21, where we increased the burden in part due to expected use for the Retirement Calculator).

Future Plans

Additional applications using RISA-KBV may be removed in future releases in favor of more secure alternatives.