**Justification for the Non-Substantive Changes for**

**Social Security Administration’s Public Credentialing and Authentication Process**

**20 CFR 401.45 & 20 CFR 402**

**OMB No. 0960-0789**

**Background**

Since its establishment in May of 2012, SSA uses the Social Security Administration’s Public Credentialing and Authentication Process (hereafter-called “eAccess”) to provide a secure, centralized gateway to Social Security’s public-facing electronic services. We currently allow users to register both through our eAccess Internet process, and through a personal interview process using the Registration and Customer Support (RCS) screens for in-person or telephone interviews.

This release will focus on creating clearer pathways for users to create or upgrade accounts to access additional services such as business services. We are making improvements to creating an advanced account for these additional services for both Internet and in-person users. Lastly, our Office of the General Counsel (OGC) also reviewed, revised, and approved updated Terms of Service language for eAccess.  
  
As always, we continue to update authentication requirements for *my* Social Security customers to ensure continued security and to enhance the system.

We will implement these new, non-substantive revisions on **September 24, 2022.** Therefore, we are asking for OMB’s approval of these revisions as soon as possible, to ensure we can implement on time.

**Revisions to the Collection Instrument**

* **Change #1:**  We developed the ‘Step Up at Service’ process which will allow the user to be directed to the appropriate identity proofing required to access a requested service.

**Justification #1:** The ‘Step Up at Service’ process guides the user to the identity proofing necessary to access a requested service. This allows users requiring access to additional services such as business services to access those applications without contacting a SSA representative.

* **Change #2:** We are adding an ‘Upgrade to Advanced’ RCS process to upgrade a hybrid account from a Standard to Advanced account.

**Justification #2:** The ‘Upgrade to Advanced’ RCS process creates greater service parity between legacy and hybrid account holders. This process also eliminates the need to reset a customer’s hybrid account when a standard account is present, and the customer requires an advanced account.

* **Change #3:** We have revised the Terms of Service language.

**Justification #3:** Our OGC revised and approved the updated the Terms of Service language.

* **Change #4:** We have made minor language and button changes to the screens.

**Justification #4:** This change is for better readability and usability for our customers.

As mentioned above, we expect to implement these revisions on **September 24, 2022**. These revisions will not affect the burden for this information collection.

**Estimates of Public Reporting Burden**

We are not adjusting the reporting burden to this information collection. OMB approved the current burden estimate on 9/28/2021.

**Future Plans**

Due to the agile nature of our projects, we expect to move more applications to our *my* Social Security landing page, which users access through the electronic access authentication. At this time, we are still finalizing our IT modernization plans for these changes. We expect to submit another change request within six to nine months to request approval for additional updates to the system, and potentially, update the burden again to include more users if we are able to move more applications to our *my* Social Security landing page.