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

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

We are making the following revisions to the Information Collection:

* **Change #1:** We are removing the COVID Screener Questions from this information collection, including the VIPr Mobile Application COVID Screener 1, Screener 2 and associated COVID fail message, as well as the telephone COVID Screener Questions.

**Justification #1:** We are removing the COVID Screener screens as per new CDC directions we no longer need to use the COVID Screener with field office visitors prior to their in-person visits.

* **Change #2:** We are removing the VIPr Mobile Check-In Application from this information collection request.

**Justification #2:** As per our discussion with OMB, respondents use the VIPr Mobile Check-In Application only to check in for their scheduled in-person field office visit. As the screens only require the respondents to click that they are checking in, and do not request any personal identifying information, or require any answers to questions, they do not require OMB approval under the PRA. Therefore, we are removing them from this ICR.

* **Change #3:** We are removing the Telephone Check-In Application from this information collection request.

**Justification #3:** As per our discussion with OMB, respondents use the Telephone Check-In Application only to check in for their scheduled in-person field office visit. As the telephone application only requires the respondents to click that they are checking in, and does not request any personal identifying information, or require any answers to questions, the Telephone Check-In Application does not require OMB approval under the PRA. Therefore, we are removing this application from this ICR.

We will implement these changes upon OMB approval. These actions reduce the public reporting burden.

**Estimates of Public Reporting Burden**

These revisions to this information collection will change the public reporting burden, as we are removing the public reporting burden for the COVID Screener questions on the VIPr Mobile Check-In Application and the Telephone Check-In Application. The burden chart below shows the updated burden information for this information collection, due to the removal of the COVID Screener questions:

|  |  |  |  |  |  |  |  |
| --- | --- | --- | --- | --- | --- | --- | --- |
| **Application Scenario** | **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** **(minutes)****\*\*** | **Total Annual Opportunity Cost****(dollars) \*\*\*** |
| **EAB Modality** |  |  |  |  |  |  |  |
| Hospital staff who relay the State birth certificate information to the BVS and SSA through the EAB process | 3,587,284 | 1 | 5 | 298,940 | $24.49\* | 0\*\* | $7,321,041\*\*\* |
| **iSSNRC Modality** |  |  |  |  |  |  |  |
| Adult U.S. Citizens requesting a replacement card with no changes through the iSSNRC | 3,141,061 | 1 | 5 | 261,755 | $27.07\* | 0\*\* | $7,085,708\*\*\* |
| Adult U.S. Citizens requesting a replacement card with a name change through iSSNRC | 44,818 | 1 | 5 | 3,735 | $27.07\* | 0\*\* | $101,107\*\*\* |
| **oSSNAP Modality** |  |  |  |  |  |  |  |
| Adult U.S. Citizens providing information to receive a replacement card through the oSSNAP+ | 866,575 | 1 | 5 | 72,215 | $27.07\* | 24\*\* | $11,338,134\*\*\* |
| Adult U.S. Citizens providing information to receive an original card through the oSSNAP+ | 31,521 | 1 | 5 | 2,627 | $27.07\* | 24\* | $412,412\*\*\* |
| Adult Non-U.S. Citizens providing information to receive an original card through the oSSNAP+ | 114,429 | 1 | 5 | 9,536 | $27.07\* | 24\*\* | $1,497,188\*\*\* |
| Adult Non-U.S. Citizens providing information to receive a replacement card through the oSSNAP+ | 63,925 | 1 | 5 | 5,327 | $27.07\* | 24\*\* | $836,382\*\*\* |
| **SSNAP/SS-5 Modality** |  |  |  |  |  |  |  |
| Respondents who do not have to provide parents’ SSNs |  2,791,499 | 1 |  9 | 418,725 | $27.07\* | 24\*\* | $41,561,248\*\*\* |
| Respondents whom we ask to provide parents’ SSNs (when applying for original SSN cards for children under age 12) |  102,258 | 1 |  9  |  15,339 | $27.07\* | 24\*\* | $1,522,471\*\*\* |
| Applicants age 12 or older who need to answer additional questions so SSA can determine whether we previously assigned an SSN  |  335,587 | 1 |  10 | 55,931 | $27.07\* | 24\*\* | $5,147,794\*\*\* |
| Applicants asking for a replacement SSN card beyond the allowable limits (i.e., who must provide additional documentation to accompany the application) | 2,428 | 1 |  60  | 2,428 | $27.07\* | 24\*\* | $92,011\*\*\* |
| **Enumeration Quality Review** |  |  |  |  |  |  |  |
| Authorization to SSA to obtain personal information cover letter | 500 | 1 | 15 | 125 | $27.07\* | 24\*\* | $8,798\*\*\* |
| Authorization to SSA to obtain personal information follow-up cover letter | 500 | 1 | 15 | 125 | $27.07\* | 24\*\* | $8,798\*\*\* |
| **Grand Total** |  |  |  |  |  |  |  |
| **Totals** | **11,082,385** |  |  | **1,146,808** |  |  | **$76,933,092\*\*\*** |

\* We based this figure on average Hospital Records Clerks (<https://www.bls.gov/oes/current/oes292098.htm>), and average U.S. worker’s hourly wages ([https://www.bls.gov/oes/current/oes\_nat.htm#00-0000](https://www.bls.gov/oes/current/oes_nat.htm%22%20%5Cl%20%2200-0000)) as reported by the U.S. Bureau of Labor Statistics.

\*\* We based this figure on the average FY 2022 wait times for field offices, 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**.

**+**The number of respondents for this modality is an estimate based on google analytics data for the SS-5 form downloads from SSA.Gov.