Justification for the Non-Substantive Changes for Integrated Registration Services (IRES) System 20 CFR 401.45 OMB No. 0960-0626

Background

The Integrated Registration Services (IRES) system is an electronic authentication process by which the Social Security Administration (SSA) registers and authenticates users of our online business services. We collect the respondent's personal information one time only when the individual registers to use our online business services. Respondents are employers; employees; third party submitters of wage data; business entities providing taxpayer identification information; appointed representatives; representative payees; and data exchange partners conducting business in support of SSA programs.

We are updating IRES to enhance the digital identity authentication process needed to access SSA's business services. We will now require users that need access to the Employer Wage Reporting (EWR) or Social Security Number Verification Service (SSNVS) applications to authenticate through our Public Credentialing and Authentication Process (OMB Clearance No. 0960-0789), known as eAccess, rather than using IRES for authentication. The other applications behind IRES will continue to follow the current authentication process, until a later release when we migrate more applications to eAccess.

We will implement this new, non-substantive revision on March 25, 2023. Therefore, we are asking for OMB's approval of these revision as soon as possible, to ensure we can implement on time.

Revisions to the Collection Instrument

• **Change #1:** We are adding new screens that the system will diplay for EWR and SSNVS users who must now create an eAccess credential to access those services.

Justification #1: SSA will require EWR and SSNVS users to register for an advanced account, using eAccess, to access those business services. We are making this change to allow for enhanced security for the user before they access these services.

• **<u>Change #2:</u>** We are revising the Terms of Service language.

Justification #2: We are updating the language, because we are moving EWR and SSNVS behind eAccess.

• **<u>Change #3:</u>** We are adding error message screens.

Justification #3: This change will assist customers that may make errors during registration.

• **<u>Change #4:</u>** We are updating and enhancing the current Business Services Online (BSO) Welcome screen.

Justification #4: This change is to provide the proper log in links for customers based on which services they need to access and to better align the BSO Welcome page design with SSA.gov.

Estimates of Public Reporting Burden

We are adjusting the reporting burden to this information collection because customers can no longer register through IRES for the EWR and SSNVS applications. We estimate we need to remove 408,357 respondents from the current pool of Internet Requestors as we anticipate those users will need to register and use eAccess instead.

Modality of Completion	Number of Respondents	Frequency of Response	Average Burden Per Response (minutes)	Estimated Total Annual Burden (hours)	Average Theoretical Hourly Cost Amount (dollars)*	Total Annual Opportunity Cost (dollars) **
IRES	266,210	1	5	22,184	\$28.01*	\$621,374**
Internet						
Registration						
S						
IRES	14,064,353	1	2	468,812	\$28.01*	\$13,131,424**
Internet						
Requestors						
IRES CS	15,247	1	11	2,795	\$28.01*	\$78,298**
(CSA)						
Registration						
S						
Totals	14,345,810			493,791		\$13,831,096**

* We based this figure on average U.S. citizen's hourly salary, as reported by Bureau of Labor Statistics data (<u>https://www.bls.gov/oes/current/oes_stru.htm</u>).

** 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.

Per our current MI data, the total number of active users of EWR and SSNVS is 408,357. We are only removing this amount from the number of respondents. We are adding this amount to the number of respondents for the eAccess package, OMB No. 0960-0789. We will update this figure as needed when we next renew this information collection, since we expect we will have more accurate MI data reflecting this change after we implement it. We also expect the number of respondents or burden hours we reported in our existing burden estimate may change, which is

why we monitor the MI data and update it when we next renew or revise this information collection. OMB approved the current burden estimate on 3/11/2022. **Future Plans**

Due to the agile nature of our projects, we expect to eventually move more applications from IRES to the eAccess platform. 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 to include the removal of more users if we are able to move applications to the eAccess platform.