

**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 the beginning of the migration of applications from our Integrated Registration Services (IRES) System (OMB No. 0960-0626) to our eAccess platform. We expect to eventually move additional applications from IRES to the more secure platform. After this upcoming system release, SSA will require IRES users that need access to the Employer Wage Reporting (EWR) and Social Security Number Verification Service (SSNVS) applications to authenticate through eAccess rather than IRES to enhance the security for these business services.

We will implement these new, non-substantive revisions on March 25, 2023. 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 are adding new screens that the system will display for EWR and SSNVS users who must now create an eAccess credential to access those services.

Justification #1: SSA will require EWR and SSNV 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.

- **Change #2:** We are revising the Terms of Service language.

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

- **Change #3:** We are adding error message screens.

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

Estimates of Public Reporting Burden

We are adjusting the reporting burden to this information collection because we expect additional customers to register an account for eAccess to allow them to access SSA's website for the EWR

and SSNVS applications. We also expect the number of respondents or burden hours we reported in our existing burden estimate to change because of the new users from IRES. In addition, we are also adjusting our burden to reflect current management information (MI) data, which shows a significant decrease in the number of RCS registrations, and a subsequent increase in Internet registrations. We attribute this decrease to fewer respondents requesting field office technicians to complete their registration for them and choosing to use the Internet registration instead. As our field offices were closed in 2020 and 2021, and only reopened in 2022, we noted that more people used the Internet to register for eAccess, rather than requesting the aid of a technician for registration using our RCS Intranet screens. We expect the RCS registration numbers may increase again as more respondents visit field offices again. We will continue to monitor the MI data and reflect the burden accordingly. OMB approved the current burden estimate on 3/30/2021.

The data below is based on our actual Management Information (MI) data for fiscal year 2022. We use different modalities to collect the information, via the Internet and the Intranet. We are updating this information based on the current MI data. In addition, we also estimate an additional 408,357 new registrations for eAccess due to the users who will want to access EWR and SSNVS. We estimated the number of minutes for completion by averaging the “time-on-task” figures we obtained from our usability testing and from our current MI data.

See chart below with the updated figures:

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)*	Average Wait Time in Field Office (minutes)**	Total Annual Opportunity Cost (dollars)***
Internet Registrations	11,788,914	1	8	1,571,855	\$28.01*		\$44,027,659***
Internet Sign-Ins	124,989,089	1	1	2,083,151	\$28.01*		\$58,349,060***
Intranet Registration (RCS)	54,908	1	8	7,321	\$28.01*	24**	\$820,845***
Totals	136,832,911			3,662,327			\$103,197,564***

* We based this figure on average U.S. citizen’s hourly salary, as reported by Bureau of Labor Statistics data (https://www.bls.gov/oes/current/oes_nat.htm#00-0000).

** We based these figures on the average FY 2021 wait times for field offices (24 minutes) and teleservice call centers (19 minutes), 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.**

NOTE: We included the total opportunity cost estimate from this chart in our calculations when showing the total time and opportunity cost estimates in the paragraph below.

The total burden for this ICR is **3,662,327** burden hours (reflecting SSA management information data), which results in an associated theoretical (not actual) opportunity cost financial burden of **\$103,197,564**. SSA does not charge respondents to complete our applications. We base our burden estimates on current management information data, which includes data from actual interviews, as well as from years of conducting this information collection. Per our management information data, we believe that the 1 or 8 minutes listed above accurately shows the average burden per response for reading the instructions, gathering the facts, and answering the questions. Based on our current management information data, the current burden information we provided is accurate.

Future Plans

Due to the agile nature of our projects, we expect to make more enhancements in the future to strengthen our electronic access authentication posture. 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 as we move more applications to a more secure authentication platform.