

Supporting Statement 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

A. Justification

1. Introduction/Authoring Laws and Regulations

Section 205(c)(2)(B) of the *Social Security Act* and section 20 CFR 422.103-422.110 of the *Code of Federal Regulations (Code)* authorize the Social Security Administration (SSA) to assign Social Security numbers (SSNs) and issue SSN cards for those numbers. Section 20 CFR 422.107 of the *Code* discusses the evidentiary and interview requirements for obtaining an SSN. 20 CFR 422.103 specifies that an individual may apply for a new or replacement SSN by completing an SSA-approved application designed for this purpose. Section 20 CFR 422.103(e)(2) of the *Code* places annual and lifetime limits on the number of replacement SSN cards SSN holders may receive (no more than three in a year and 10 per lifetime).

2. Description of Collection

SSA requires information collected from the form SS-5 and SS-5-FS to be able to issue original, replacement cards and change or correct information on a Social Security number record. The agency uses a number of different instruments to collect this information depending on when the collection happens (such as at birth or later in life), the evidence it needs to collect from the respondent, the need to validate the respondent's identity, and the different modes available (including paper applications, electronic, and in-person interviews).

Instruments and modes used to collect data for original and replacement SSN cards include:

Form SS-5/SS-5-FS – This is a paper application used to collect data to request an original and replacement Social Security number (SSN) card or a change or correct information on a social security number record. All respondents can use this form and submit it in person at a field office or Foreign Benefits Unit. Form SS-5-FS collects the same information as the SS-5 but includes separate instructions for respondents who are responding to the information collection overseas. An overseas respondent could submit an SS-5, but the SS-5-FS's instructions are likely more relevant to them than those on the SS-5.

Social Security Number Application Process (SSNAP) – a web-based, Intranet application used internally by SSA personnel to collect and store SS-5 data during an in-office interview.

Enumeration at Birth (EAB) – for newborns, a hospital, birthing center, or licensed midwife collects information and submits information to SSA under the EAB process. The vast majority of applications for original SSN cards utilize EAB. In this process, parents of newborns provide information required to register newborns. This information is sent to State Bureaus of Vital Statistics (BVS) who send the information to SSA's National Computer Center. SSA uses the information to assign a newborn an SSN and issue a Social Security Card. EAB also includes SSA receipt of race and ethnicity information for the newborn and parent(s) if the parent(s) consent to release of this voluntary information. With parental consent, States and Jurisdictions ask questions to collect a newborn's race and ethnicity information. If the parent(s) give consent, the State BVS electronically shares the race and ethnicity of parent(s) and newborn, consistent with the EAB process. State BVS send the information electronically to SSA's National Computer Center through data-matching agreements. SSA uploads the data to the SSA mainframe along with all other enumeration data and assigns the newborn a Social Security number (SSN) and issue a Social Security card.

Internet Social Security Number Replacement Card (iSSNRC) – this Internet application collects information similar to the paper SS-5 for no-change (i.e., date of birth, place of birth, parent's names and SSNs or citizenship status), or name-change (due to marriage) replacement SSN cards for adult U.S. citizens. The iSSNRC modality allows certain applicants for SSN replacement cards to complete the Internet application and submit the required evidence online rather than completing a paper Form SS-5 and visiting an SSA office (i.e., iSSNRC is fully automated). Members of the public who have a [mySocial Security](#) account may access iSSNRC by clicking "Request a replacement Social Security card" via the [mySocial Security](#) portal from SSA's public website. The iSSNRC allows no-change replacement SSN cards because we secured identity validation data exchange with the majority of State Departments of Motor Vehicles. In addition, we have secured a contract with the National Association for Public Health Statistics and Information Systems (NAPHASIS) to help us verify an individual's state marriage data and provide a matching result of the requested marriage data. This marriage data verification allows iSSNRC to issue name-change replacement cards (due to marriage). We continue to explore ways to expand the capabilities and functionalities of the iSSNRC process to allow for additional populations.

Online Social Security Number Application Process (oSSNAP) – this Internet application which does not require access to the [mySocial Security](#) portal collects

information similar to a paper SS-5. Certain individuals can start an original or replacement SSN card application on-line via oSSNAP, receive a list of required evidentiary documents, and then submit the application data to SSA for further processing by SSA employees via SSNAP. Applicants will need to visit a local SSA office to complete the application process (i.e., oSSNAP is partially automated).

Enumeration Quality Review (EQR) Process – SSA’s EQR process measures the quality of various aspects of the enumeration process. Specifically, the EQR measures the accuracy of SSNs assigned for original SSN cards processed through SSNAP and assigned through EAB (both processes discussed above). SSA uses Form SSA-2935-OP1 to serve as a disclosure form that we use for the EQR process to obtain authorization from applicants, so we can request information from third parties (i.e., custodians of records). This authorization allows SSA to request: (1) state BVSs to release the certified record to SSA; (2) applicants to send the original document directly to SSA; or (3) applicants or their authorizers to send a copy of the authorizer’s (parent’s or an SSA employee’s) valid identification.

We identified the following psychological costs based on the requirements for this information collection:

- Psychological Cost #1:
 - Requirement for the Program: We ask respondents to submit prior names they have used which SSA may have on file before we can send them a replacement SSN card.
 - Psychological Cost: Some respondents may perceive this request as unnecessary or invasive, as they no longer use the prior name(s). However, we need this information to ensure we can replace their SSN card with their new name.
- Psychological Cost #2:
 - Requirement for the Program: We request voluntary race and ethnicity information from respondents on all of our enumeration modalities.
 - Psychological Cost: Some respondents may consider this as invasive. However, we mitigate this by making this section voluntary to submit.

We understand these psychological costs may cause respondents to delay their completion of the information collection or cause them to abandon the information collection entirely. However, we require full completion of this collection to receive an SSN card. Therefore, we have taken this potential psychological cost into account when calculating our burden in #12 below.

The respondents for this collection are applicants for original and replacement Social Security cards, or individuals who wish to change information in their SSN records, who use any of the modalities described above; as well as applicants for SSN cards through the SSNAP and EAB process who take part in our EQR.

3. **Use of Information Technology to Collect the Information**

As discussed above, some aspects of this information collection can be conducted electronically, while other aspects require in-person submission.

The vast majority of respondents for original SSN cards are enumerated at birth. While the collection method varies from state-to-state, all EAB requests are electronically transmitted to SSA's National Computer Center through electronic interfaces with the State vital records agency. SSA uses the information from the State to enumerate the infants and issue SSN cards through an automated process.

U.S.-based citizens who are able to access the [mySocial Security](#) portal may be able to use the iSSNRC process described above to request replacement cards via a fully automated online process, once our system authenticates their identities. iSSNRC is fully automated because the agency is able to validate identity with State DMVs via a contractor (AAMVA). Because iSSNRC is limited to individuals applying for themselves and is accessible only through the authenticated [mySocial Security](#) portal, this level of electronic verification sufficiently balances risk with the service provided.

All U.S. based citizens who cannot access the [mySocial Security](#) portal or request a replacement SSN card via iSSNRC, can initiate an online replacement SSN card request, including replacement cards with a name change, via the oSSNAP web application. This process is only partly automated, as respondents must go to an SSA field office with the requisite information for an SSA employee to complete the application process via SSNAP. Because the provision of services has a higher risk level than simply SSN card replacement, SSA requires in-person identity verification at this time.

There are certain respondent groups who do not have the ability to submit this information request electronically: all respondents who are non-U.S. citizens; respondents who are applying for an original SSN card; and respondents who are seeking to change the date of birth, place of birth, parent's names, or citizenship status.

Including the EAB process and all requests for original SSN cards, SSA processes approximately 87% of respondents fully electronically each year. Excluding the EAB

process and only considering replacement card requests, SSA processes approximately 46% of respondents fully electronically each year.

4. Why We Cannot Use Duplicate Information

The nature of the information we collect and the manner in which we collect it preclude duplication. SSA does not use another collection instrument to obtain similar data.

5. Minimizing Burden on Small Respondents

This collection does not affect small businesses or other small entities.

6. Consequence of Not Collecting Information or Collecting it Less Frequently

If we did not use Forms SS-5 and SS-5-FS, the public would have no way to apply for SSNs and SSN replacement cards. Since the public needs SSNs to maintain earnings records; apply for jobs; file tax returns; open accounts at financial institutions; etc., not having an SSN or SSN card would be a great disadvantage. Because we only collect the information on an as needed basis, we cannot collect it less frequently. There are no technical or legal obstacles to burden reduction.

7. Special Circumstances

There are no special circumstances that would cause SSA to collect this information in a manner inconsistent with *5 CFR 1320.5*.

8. Solicitation of Public Comment and Other Consultations with the Public

The 60-day advance Federal Register Notice published on August 17, 2023, at 88 FR 56065, and we received no public comments. The 30-day FRN published on November 15, 2023 at 88 FR 78444. If we receive any comments in response to this Notice, we will forward them to OMB.

9. Payment or Gifts to Respondents

SSA provides no payment or gifts to the respondents.

10. Assurances of Confidentiality

SSA protects and holds confidential the information it collects in accordance with *42 U.S.C. 1306*, *20 CFR 401* and *402*, *5 U.S.C. 552* (Freedom of Information Act), *5 U.S.C. 552a* (Privacy Act of 1974), and OMB Circular No. A-130.

11. Justification for Sensitive Questions

The information collection does not contain any questions of a sensitive nature.

12. Estimates of Public Reporting Burden

The following chart shows the burden for each application scenario. Respondents for

each of these scenarios may use any of the current modalities available for the SS-5 and SS-5-FS, unless otherwise indicated in the chart below:

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	3,759,517	1	5	313,293	\$24.49*	0**	\$7,672,546***
iSSNRC Modality							
Adult U.S. Citizens requesting a replacement card with no changes through the iSSNRC	3,002,698	1	5	250,225	\$29.76*	0**	\$7,446,696***
Adult U.S. Citizens requesting a replacement card with a name change through iSSNRC	1,312	1	5	109	\$29.76*	0**	\$3,244***
oSSNAP Modality							
Adult U.S. Citizens providing information to receive a	822,104	1	5	68,509	\$29.76*	24**	\$11,825,166***

replacement card through the oSSNAP*							
Adult U.S. Citizens providing information to receive an original card through the oSSNAP*	37,323	1	5	3,110	\$29.76*	24**	\$536,841***
Adult Non-U.S. Citizens providing information to receive an original card through the oSSNAP*	204,081	1	5	17,007	\$29.76*	24**	\$2,935,497***
Adult Non-U.S. Citizens providing information to receive a replacement card through the oSSNAP*	84,635	1	5	7,053	\$29.76*	24**	\$1,217,392***
SSNAP/SS-5 Modality							
Respondents who do not have to provide parents' SSNs	6,973,505	1	9	1,046,026	\$29.76*	24**	\$114,142,337***
Respondents whom we ask to provide parents' SSNs (when applying for original SSN cards for children under age 12)	207,521	1	9	31,128	\$29.76*	24**	\$3,396,687***
Applicants age 12 or older who need to answer additional	1,113,144	1	10	185,524	\$29.76*	24**	\$18,772,072***

questions so SSA can determine whether we previously assigned an SSN							
Applicants asking for a replacement SSN card beyond the allowable limits (i.e., who must provide additional documentation to accompany the application)	6,703	1	60	6,703	\$29.76*	24**	\$279,268***
Enumeration Quality Review							
Authorization to SSA to obtain personal information cover letter	500	1	15	125	\$29.76*	24**	\$9,672***
Authorization to SSA to obtain personal information follow-up cover letter	500	1	15	125	\$29.76*	24**	\$9,672***
Grand Total							
Totals	16,213,543			1,928,937			\$168,247,090***

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

* 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) 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.**

In addition, OMB’s Office of Information and Regulatory Affairs (OIRA) is requiring SSA to use a rough estimate of a 30-minute, one-way, drive time in our calculation of the time burden for this collection. OIRA based their estimation on spatial analysis of SSA’s current field office locations and the location of the average population centers based on census tract information, which likely represents a 13.97-mile driving distance for one-way travel. We depict this on the chart below:

Total Number of Respondents Who Visit a Field Office	Frequency of Response	Average One-Way Travel Time to a Field Office (minutes)	Estimated Total Travel Time to a Field Office (hours)	Total Annual Opportunity Cost for Travel Time (dollars)****
9,450,016	1	30	4,725,008	\$140,616,238****

****We based this dollar amount on the Average Theoretical Hourly Cost Amount in dollars shown on the burden chart above.

Per OIRA, we include this travel time burden estimate under the 5 CFR 1320.8(a)(4), which requires us to provide “time, effort, or financial resources expended by persons [for]...transmitting, or otherwise disclosing the information,” as well as 5 CFR 1320.8(b)(3)(iii) which requires us to estimate “the average burden collection...to the extent practicable.” SSA notes that we do not obtain or maintain any data on travel times to a field office, nor do we have any data which shows that the average respondent drives to a field office, rather than using any other mode of transport. SSA also acknowledges that respondents’ mode of travel and, therefore, travel times vary widely dependent on region, mode of travel, and actual proximity to a field office.

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.

We calculated the following Learning Cost time burden based on the estimated time and effort we expect respondents will take to learn about this program, its applicability to their circumstances, and to cover any additional research we believe respondents may need to take to understand how to comply with the program requirements (beyond reading the instructions on the collection instrument):

Total Number of Respondents	Frequency of Response	Estimate Learning Cost (minutes)	Estimated Total Annual Burden (hours)	Total Annual Learning Cost (dollars)**
16,213,543	1	30	8,106,772	\$241,257,535****

****We based this dollar amount on the Average Theoretical Hourly Cost Amount in dollars shown on the burden chart above.

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.

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 average time in minutes listed in the chart 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. The total burden for this ICR is **1,928,937** burden hours (reflecting SSA management information data), which results in an associated theoretical (not actual) opportunity cost financial burden of **\$550,120,863**. SSA does not charge respondents to complete our applications.

13. Annual Cost to the Respondents (Other)

Under the EAB process, the State BVSs incur costs for participating in EAB. The State BVSs incur a total cost of approximately \$14 million for transmitting data to SSA’s mainframe. Please note the States receive reimbursement for these costs.

14. Annual Cost to Federal Government

The annual cost to the Federal Government for these collections is approximately **\$531,492,089**. This estimate accounts for costs from the following areas:

Description of Cost Factor	Methodology for Estimating Cost	Cost in Dollars*
Designing and Printing the Form	Design Cost + Printing Cost	\$168,892
Distributing, Shipping, and Material Costs for the Form	Distribution + Shipping + Material Cost	\$30,591
SSA Employee (e.g.,	GS-9 employee x # of	\$518,492,606

field office, 800 number, DDS staff) Information Collection and Processing Time	responses x processing time	
Full-Time Equivalent Costs	Out of pocket costs + Other expenses for providing this service	\$0*
Systems Development, Updating, and Maintenance	GS-9 employee x man hours for development, updating, maintenance	\$12,800,000
Quantifiable IT Costs	Any additional IT costs	\$0*
Total		\$531,492,089

* We have inserted a \$0 amount for cost factors that do not apply to this collection.

SSA is unable to break down the costs to the Federal government further than we already have. First, since we work with almost every US citizen, we often do bulk mailings, and cannot track the cost for a single mailing. In addition, it is difficult for us to break down the cost for processing a single form, as field office and State Disability Determination Services staff often help respondents fill out several forms at once, and the time it takes to do so can vary greatly per respondent. As well, because so many employees have a hand in each aspect of our forms, we use an estimated average hourly wage, based on the wage of our average field office employee (GS-9) for these calculations. However, we have calculated these costs as accurately as possible based on the information we collect for creating, updating, and maintaining these information collections.

15. Program Changes or Adjustments to the Information Collection Request

When we last cleared this information collection in March 2022, the burden was 1,146,724 hours. However, we are currently reporting a burden of 1,928,937 hours. This change stems from an increase in the number of respondents applying for original and replacement cards at SSA offices due to the restoring of full services and reopening of SSA offices in April 2022.

* **Note:** The total burden reflected in ROCIS shows the additional combined time totals for the field office and telephone call system wait times (for those ICs that require them) as well as the rough estimate of a 30-minute, one-way, drive time in our calculation of the time burden (for those ICs requiring field office visits), and a 30-minute learning cost. This is why the burden estimates on ROCIS do not match the chart in #12 above.

16. Plans for Publication Information Collection Results

SSA will not publish the results of the information collection.

17. Displaying the OMB Approval Expiration Date

Paper Forms SS-5, SS-5-FS

OMB granted SSA an exemption from the requirement to print the OMB expiration date on its program forms. SSA produces millions of public-use forms with life cycles exceeding those of an OMB approval. Since SSA does not periodically revise and reprint its public-use forms (e.g., on an annual basis), OMB granted this exemption so SSA would not have to destroy stocks of otherwise useable forms with expired OMB approval dates, avoiding Government waste.

oSSNAP, iSSNRC & SSNAP

SSA is not requesting an exception to the requirement to display the OMB approval expiration date.

18. Exceptions to Certification Statement

SSA is not requesting an exception to the certification requirements at 5 *CFR* 1320.9 and related provisions at 5 *CFR* 1320.8(b)(3).

B. Collections of Information Employing Statistical Methods

SSA does not use statistical methods for this information collection.