

**Addendum to the Supporting Statement for
Supplemental Security Income Simplification Process Phase I (iSSI)
20 CFR 416.305 - 20 CFR 416.335, Subpart C
OMB No. 0960-NEW**

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Background

SSA is embarking on a multi-phase effort to streamline and make the application process faster for Supplemental Security Income (SSI) recipients. As part of this effort, SSA is streamlining the SSI application questions to first establish basic non-medical eligibility, and then defer additional development questions until after the medical review is complete. We expect these changes to reduce the burden associated with the SSI application process and improve access to SSI.

As part of this effort, our goal is to develop a more user friendly, simplified SSI application and process. As an important step toward that goal, we are currently planning to implement the first phase of the SSI Simplification initiative (i.e., Phase I) in late 2024. Phase I will be a pathway in the existing Social Security Internet Claim (iClaim) System that will include a streamlined SSI application (iSSI) for Title XVI disability applicants.

Following Phase I implementation, SSA plans on implementing future phases, which are not covered by this information collection request. For example, in response to public feedback, SSA plans to implement the streamlined application for in-person, telephone, and paper applications along with the technician-supported development process in FY 2026. SSA will intend to explore efforts to introduce a mobile version of the application that makes the simplified SSI application available to individuals who have online access.

SSI Simplification

To apply for SSI payments, members of the public usually file an application via an in-person or telephone interview with an SSA technician. Although we have a paper SSI application that individuals can fill out and SSA will accept, it is long and complex, and not designed for members of the public to complete on their own. Advocates and Members of Congress expressed concerns with the length and complexity of the SSI paper application. We currently also have an online filing option through iClaim, but it is limited to certain individuals who are filing for Disability Insurance Benefits (DIB) concurrent with an SSI claim if they meet specific criteria (i.e., U.S. citizen, residing in U.S., who never married, and filed no previous SSI claims). Individuals who do not meet these criteria can still let us know they want to file for SSI by answering “yes” to the “Do you intend to apply for SSI?” question. In this situation, we contact individuals to obtain the SSI application over the telephone. In addition, SSI applications decreased during the COVID-19 pandemic. These challenges highlighted the need for underserved communities to have new ways to access our programs. In response, we initiated review and are undergoing efforts to simplify the SSI application process, starting with the implementation of a more robust online SSI application.

To address these complexities, we are using a hybrid approach to the SSI application which consists of two separate pieces: (1) a simplified SSI application focused on capturing the claimant’s basic eligibility for SSI, and (2) a technician-supported development experience after the medical approval to obtain additional information necessary to make an initial determination for payments. This approach modifies and improves the basic eligibility questions, while striking a balance between improving the applicant’s filing experience and collecting all

information necessary to make eligibility determinations. This user-centered approach aligns with Executive Order 13985, Advancing Racial Equity and Support for Underserved Communities Through the Federal Government¹, and Executive Order 14058, Transforming Federal Customer Experience and Service Delivery to Rebuild Trust in Government².

As a first step, we are adding simplified questions to the SSI disability application in the iClaim System to gather basic eligibility information and reduce the need to recontact claimants. Technicians will no longer contact claimants to obtain the developmental questions of the Deferred SSI Application (SSA-8001, OMB No. 0960-0444) prior to a medical determination. Instead, the respondent will complete the basic SSI eligibility questions in iClaim, along with other existing steps within the iClaim disability path, such as providing information regarding their disabilities and medical history (using the i3368, OMB No. 0960-0579) and, as applicable, signing a medical release using the i827 (OMB No. 0960-0623). Upon submission of the online application, technicians will review the responses for completeness and, if the claimant appears to meet the basic eligibility requirements, then send the claim to the Disability Determination Services (DDS) for medical determination. Prior to a DDS medical determination, technicians may contact claimants in situations where they require clarification of the submitted responses or to resolve questions about the eligibility information (e.g., situations in which income or resources may seem over the limits, allegations of work or self-employment and indications of substantial gainful activity (SGA), etc.).

SSA created new SSI-related screens in iClaim for the SSI questions related to immigration status, living arrangements, income, and resources information. We are also removing the exclusion for applicants to include non-U.S. citizens. We will populate responses to these questions along with responses to some of the Disability application's questions into SSI Claims' deferred claims path. As we implement future enhancements, we will be able to broaden the scope of applicants who can file for SSI online.

Revision to the Collection Instrument

Below we summarize the changes to the online SSI application which interacts with the Disability (DIB) application screens in the Internet Claim (iClaim) System reported under OMB No. 0960-0618. These changes include adding SSI basic eligibility, questions and expanding the type of respondents for an SSI Internet application to include non-U.S. citizens. To avoid additional burden to the public and duplicative data entry, we will leverage information that an individual already enters into the online DIB application for the SSI questions. We are currently utilizing data for the claimant's name, SSN, date of birth, allegation of blindness or disability, date of onset, mailing and residence addresses, phone number. As part of the new iSSI screens, we will also use applicable marriage, employment, and self-employed responses. The updates listed below include screens for individuals filing for themselves, i.e., First-Party respondents, and individuals assisting with the filing process for others, i.e., Third-Party respondents:

¹ [The Federal Register](#) - Advancing Racial Equity and Support for Underserved Communities Through the Federal Government

² [The Federal Register](#) - Transforming Federal Customer Experience and Service Delivery To Rebuild Trust in Government

- **Change #1:** We will leverage the following from the Internet Disability application under OMB-0960-0618:
 - Welcome page to enter the SSI application.
 - Citizenship (which includes country of citizenship for other countries)
 - Marriage
 - Employment and work wages

Justification #1: We are leveraging these responses to prevent respondents from having to answer the questions twice. The Welcome page will be linked to the new SSA public webpages (see the SSA Journey screens) which provide additional information about SSI and will provide access to the iClaim System. We will use the citizenship, marriage, and employment/work wages data collected on the Disability (DIB) application screens (OMB No. 0960-0618) to prefill relevant answers on the new SSI pages (e.g., names of employers propagate on the income resource screen). We will also use the data collected once for both DIB and SSI Internet application summaries.

- **Change#2:** We added two informational pages within iClaim’s new SSI path to provide an “Income Overview” and “Resources Overview” (**see screen #4 and screen #8**).

Justification #2: In response to questions received during usability testing as to why we were collecting information about income and resources, we added these pages to provide additional information on income or resources. These pages also provide guidance to individuals about what information they may need to provide.

- **Change #3:** We added the question, “What date did you become a citizen of [name of foreign country]” (**see screen #2**).

Justification #3: We added this question for operational purposes as a short-term solution to address current system constraints.

- **Change #4:** We added the following SSI questions to the Internet SSI application. However, under dynamic pathing, only relevant questions will appear based on the applicant’s responses within the DIB application, e.g., answering “Yes” to the question “are you working.”

- Are you a student who regularly attends classes? (**see screen #1**)
- Select your immigration status (**see screen #2**)
 - Alien with deportation withheld
 - Amerasian immigrant
 - Asylee
 - Battered alien or alien with a battered child or parent
 - Canadian-born American Indian
 - Conditional entrant
 - Cuban or Haitian entrant
 - Iraqi or Afghan special immigrant
 - Lawful permanent resident

- Non-citizen member of a federally recognized Indian tribe
 - Parolee (1 year or more)
 - Refugee
 - Victim of severe forms of trafficking (VSFT)
 - Other
 - Not lawfully present
- Select the option that best describes where you live (**see screen #3**)
- House, Apartment, Mobile Home, Houseboat
 - Room in commercial establishment (Example: hotel or motel)
 - Room in private residence
 - Institution (Example: Nursing Home, Rehabilitation Center, Hospital, School, or Jail and dates)
 - Non-Institutional Care (Example: Placed by an agency in foster care, adult foster care, retirement home, or family care by an agency)
 - Transient or Homeless
- How much do you expect your gross wages will be for the following employer(s) in [month of filing] (**see screen #5**).
- Are you receiving or expect to receive sick pay in [month of filing] and what is the gross amount (**see screen #6**).
- Select the income source(s) you received or expect to receive in [month of filing] (**see screen #7**). Individuals can select relevant sources of income and enter the monetary amount:
- Child Support
 - Gambling winnings or prizes
 - Gifts
 - Monthly cash from family or friends
 - Pensions or other retirement
 - Settlements
 - State Disability Insurance
 - State or Local Assistance
 - Temporary Assistance for Needy Families (TANF)
 - Unemployment Compensation
 - Veterans Affairs (VA) benefits
 - Workers' Compensation
 - Other (provide text box)
 - None of the Above
- After explaining the definition of resources (**see screen #8**) we ask respondents to select the items you own, either alone or with other people, as of [month of filing] (**see screen #9**). Individuals can select from the following:
- Cash (at home, with you, or anywhere else)
 - Financial institution accounts (examples: checking or savings accounts, credit union, holiday club, time deposits, Individual Indian Money account, or Direct Express)
 - Stocks
 - Mutual funds

- U.S. savings bonds
- None of the above
- We ask respondents to indicate if they own any of the following and to provide the value:
 - Owner or beneficiary of any trusts
 - Vehicles they have in their name
 - Real estate or property, excluding their home – either alone or with other people
 - Any life insurance policies
 - Anything else that could be turned into cash and used to pay for food or shelter
 - Any items or money they sold, transferred title on, or gave away within the last three years.

Justification #4: We added these questions to determine SSI eligibility factors which technicians can review, and process as needed (e.g., send claim for medical determination, or seek further clarification using SSA records or through recontacting the applicant). These additional screens will allow Internet respondents to apply for SSI through iClaim.

- **Change #5:** We added language to the “Review Information” page which displays the provided answers. Under the same page, we also updated the signature section and the message that follows to provide relevant information about the signature for the SSI application (**see screen #11**).

Justification #5: The updated message informs respondents that SSA will use the information and signature provided for both applications (DIB and SSI) and the action of selecting “Accept & Continue” is what electronically signs their applications and other forms.

- **Change #6:** We removed OMB No. 0960-0444 and Paperwork Reduction Act link from the top of the “Other Benefits” page (**see screen #12**).

Justification #6: While we removed the OMB number from the Other Benefits page, we added OMB No. 0960-4444 and the associated Paperwork Reduction Act link to the Welcome Page since we are leveraging some disability questions for the SSI Internet claim.

- **Change #7:** We removed the question “Is everyone in your household receiving or applying for Supplemental Security Income?” from the “Other Benefits” page (**see screen #12**).

Justification #7: We are removing this question because we have a revised Supplemental Nutrition Assistance Program (SNAP) message that applies to all SSI applicants, so it is no longer necessary for respondents take the time to complete this question.

- **Change #8:** We are updating the message applicants currently receive on screen when submitted information leads to an error.

Justification #8: To reduce the risk of fraud, we are updating the message to be consistent with other messages we provide for similar errors. The message will inform individuals that we cannot process their request and to contact SSA for further assistance.

Upon OMB approval of this new information collection request, SSA will fold these revisions back into the individual information collections under OMB numbers 0960-0229, 0960-0444, and 0960-0618 via Change Requests. Once we obtain approval for those Change Requests, we will discontinue this new information collection request, and will use the currently approved OMB Control numbers when we revise the iSSI screens or processes in the future.

Terms of Clearance

OMB placed Terms of Clearance on the Information Collection for 0960-0444 when they last approved it on 5/18/2023. As these Terms relate to the current iSSI process, we are addressing them here. OMB's Terms of Clearance for 0960-0444 are as follows:

Prior to the next substantive ICR revision or triannual extension (whichever is first), the agency will review and revise the supporting statement to achieve the following:

- **OMB Term #1:**

Provide a more-detailed narrative description of the experience of the information collection from the perspective of a respondent from the beginning to end of the submission experience. This should be consistent with the guidance in M-22-10.

SSA Response: In accordance with the guidance in M-22-10, we added language in #2 of the Supporting Statement to include a more detailed narrative of the respondent's experience with this information collection from the beginning to the end of the submission experience.

- **OMB Term #2:**

Clearly describe the common set of circumstances in which a respondent is asked to complete the SSA-8001 instead of the SSA-8000.

SSA Response: Since neither the SSA-8001 or SSA-8000 are self-help forms or for public consumption, trained SSA technicians are responsible for determining what version of the SSI application in the SSA system to use during the application interview depending on the responder's unique situation. The information requested by technicians during the interview using the full application (SSA-8000) includes all the questions for eligibility, income and resources for certain family members and its required evidence development which prevents delays on payments when there is a medical approval decision. SSA instructs technicians to only use the Intranet version of the SSA-8000 for initial claim interviews when respondents:

- Have a condition that would likely meet a medical allowance (e.g., terminal illness, presumptive blindness, compassionate allowance (CAL) conditions such leukemia,

lymphoma, etc.) which allows technicians to simultaneously submit the application for medical evaluation and continue the income and resources development. This process ensures that the medical evaluation is not delayed due to any pending non-medical development; or

- o File for aged benefits; or
- o File together with a spouse (*i.e.*, couple cases); or
- o Meet the Expeditious Handling criteria (*e.g.*, homeless, pre-release from public institutions, etc.).

In contrast, SSA instructs technicians to always use the deferred or abbreviated Intranet version (SSA-8001) of the SSI application to (1) provide a formal determination when non-medical information the applicant provides results in ineligibility; or (2) defer the complete development of non-medical issues until the Disability Determination Services (DDS) approves the medical portion of the disability process.

Specifically, SSA technicians use the information from the SSA-8001 when the filing respondents seem to meet the non-medical eligibility requirements for at least one month and SSA can defer other development until the respondent receives a notice of medical allowance. After the initial interview and upon receiving medical allowance, technicians contact respondents to develop any deferred issues and update the information about income and resources from the time the respondent filed the application up to the month the respondent received SSA's approval. To continue monthly payments, technicians also request information about future projected income. At that point, SSA technicians use the Intranet version of the SSA-8000 to develop the remaining necessary information and request evidence as needed.

Recent discussions with third-party helpers and advocates indicate that they regularly complete and mail the paper SSA-8000 on behalf of applicants. However, that adds an unnecessary burden to responders, as most of the information is only needed after the medical approval. The online iSSI streamlined application will 1) ensure we collect basic eligibility information, and 2) make it easier for applicants to file for benefits by paving the way for future phases where we will implement the streamlined application in the other service channels (*i.e.*, in person or phone interviews, and paper form).

- **OMB Term #3:**

Upload a supplemental document that discusses each question in the SSA-8001 and analyzes the statutory, regulatory, and programmatic basis for the question.

SSA Response: SSA will submit the requested chart to OMB as part of the next submission for OMB No. 0960-0444 (which will be when we submit the Change Request showing the changes listed above). OMB requested that we analyze each question on the form in terms of the statutory, regulatory, and programmatic basis for the question, which proved to be a lengthy process. As OMB placed this request on the

approval for our SSA-8001 (OMB No. 0960-0444), we will submit the requested chart to OMB when we next submit the 0960-0444 documentation for OMB approval of the information collection.

Future SSI Plans

After considering the Public Comments on the Information Collection (see below), SSA has determined that Phase II of the SSI multi-phase effort will focus on implementing the new SSI process in the other service channels (i.e., in-person or phone interviews, and paper form) by mid to late 2025. As part of Phase II, we also plan on simplifying the technician-supported development process to further limit the amount of information we directly collect from the public when developing for eligibility and payment amounts.

Public Comments on the Information Collection

a. 60-Day Comment Period Federal Register Notice (FRN):

The 60-day Comment Period FRN published on August 9, 2023, at 88 FR 53945. The comment period began on August 9, 2023, and ended on October 10, 2023, at 11:59pm. We received a total of **64** public comments on the 60-day comment period FRN. Of those, we received and posted **61** comments, and we did not post three duplicate comments. The following contains a summary of the comments we received, as well as SSA's responses. The comments and our responses here are grouped by subject matter, and so the numbering we use here does not match up to the 61 comments we posted.

Comments Regarding the Overall Burden for the SSI Application (all modalities)

Comment #1: Several commenters questioned why, under the new iSSI process, it seems more respondents will complete the SSA-8000 rather than the SSA-8001. They asked SSA to explain how the new process will reduce burden if this assumption was accurate.

SSA Response #1: The new iSSI process will not require more respondents to complete the SSA-8000. The first phase of the SSI Simplification project will reduce public burden as respondents will respond to the basic eligibility questions in the online SSI application and if there is a favorable disability determination, we will then request the required evidence and developmental information, as needed.

Comment #2: One commenter questioned why (based on our estimated time burdens) it is faster to complete an in-person SSA-1 than it is to file online.

SSA Response #2: The average completion time for the paper SSA-1 is roughly 4 minutes faster than Internet applications, because there are a few extra initial steps in the online process. An online applicant must first read through and acknowledge the opening statements regarding electronic Terms of Service, sign in to, or create a new mySocialSecurity account, and enter information about who is completing the application (both first and third parties), before starting the benefit application questions themselves.

The general assumption is that the paper SSA-1 application is completed and does not collect preparer information, mySocialSecurity account information, or electronic Terms of Service. These few extra steps for electronic application services are only differentiated in the entry and access to start the application itself. Ultimately, though, an online service offers other conveniences over a field office visit (e.g., avoiding scheduling an appointment and driving) that the public may prefer.

Comment #3: One commenter asked if the new process would reduce the cumbersome process of completing a lengthy application initially, only to be asked the questions again once a medical decision is made.

SSA Response #3: The system will only ask applicants or their third-party helpers questions that are necessary to file the online application and will not ask the same questions twice. Our intent for the first phase of the SSI simplification effort is to improve the current process by reducing the amount of information we collect when completing an SSI application.

Comment #4: Based on the burden data SSA shared in the FRN, projecting the decrease in the number of SSA-8000 applications to 1,080 annually, one commenter asked for data regarding the expected increase in SSI applications for the Internet version or the SSA-8001.

SSA Response #4: We expect a 5% increase in iSSI claims due to the expansion of iSSI to non-U.S. citizens and to marketing of the SSI program. It is important to clarify that the 1,080 figure only represents the number of SSI applicants who initially submit the limited SSI online claim and subsequently a technician determined that we needed the full application based on their specific situation.

Comment #5: One commenter asked SSA to provide the new number of SSI applications expected through the updated iClaim.

SSA Response #5: In terms of the expected volume of new SSI claims, we expect to receive between approximately 125-150 new SSI claims per week through the updated iClaim. To assist agency technicians, we also expect to have substantially more information about potential eligibility with the additional income and resource questions.

Comment #6: Some commenters asked SSA to provide the number of applicants who fall into each of the following categories that require a full application (SSA-8000): (1) has a medical condition likely to meet a medical allowance; (2) is filing for aged benefits; (3) is filing with a spouse; and (4) meets criteria for expeditious handling.

SSA Response #6: Our data shows that for FY 2023 we processed the full (SSA-8000) SSI applications as follows: (1) 30% of full applications for those who have a medical condition likely to meet a medical allowance; (2) 15% of full applications for those who filed for aged benefits; and (3) 5% for those who filed with a spouse. The remaining full applications met the criteria for expeditious handling.

Comment #7: One commenter noted the burden chart for the SSA-8000 shows a 19-minute wait time (field office or telephone), and asked why there is a wait time for an online application.

SSA Response #7: This is a *theoretical* average wait time that could potentially apply to field office or telephone visits or sessions, **not an actual wait we impose on respondents.** While we expect no field office or telephone wait time for some of the new iSSI respondents, we include it as some of the iSSI respondents may complete the online process but need to visit a field office or call us to inquire about the status of the application or to provide additional information.

Comment #8: One commenter asked SSA to clarify why the Internet application process will be somewhat faster, but not much faster when the applicant will no longer need to schedule an appointment or wait for an interview and can complete the application without contact.

SSA Response #8: Overall, the application process will be faster for most individuals using this online service. However, although we are simplifying the questions for the benefit applications and we will be leveraging collected information for multiple questions, technicians may still need to contact applicants for additional development before sending the case for a medical determination in situations where we need additional clarification on the information. In most situations we will contact applicants when they do not complete the online medical report (i.e., i3368, OMB No. 0960-0579), or to provide a signed medical release authorization (SSA-827, OMB No. 0960-0623) to obtain their medical records.

Comment #9: Several commentors noted low staffing levels in the field offices, expressing concern that there are not enough staff to handle issues in the field offices now, and that iSSI would only add to that burden.

SSA Response #9: In actuality, because claimants using iSSI will only need to speak with an SSA employee for some questions rather than needing an SSA employee for the entire application, we expect iSSI will ultimately *save* time for field office employees. We expect the new iSSI process will allow respondents to begin the SSI application process on their own without the need to contact SSA, which will also help respondents complete their applications faster. Upon submission of the online application, technicians will review the responses for completeness and send the claim to the DDS for medical determination. We expect this review will take significantly less time for SSA technicians than it would for them to conduct a personal interview with the respondents. While technicians may still need to contact claimants prior to a DDS medical determination in situations where they require clarification of the submitted responses or to resolve questions about the eligibility information, we expect the use of the iSSI will allow for shorter and fewer recontact calls.

Comment #10:

Some commenters noted that the elimination of faxed-in applications may result in another step for claimants which may be burdensome for the respondents.

One advocacy group asserted that the agency eliminated faxed applications due to the risk of fraud but provided no evidence of an increase in fraud. This advocacy group suggested that, until there is a working electronic process in place that provides simplified access to all applicants, SSA should reconsider the termination of signed and faxed applications to lower the burden on the public.

SSA Response #10:

The COVID-19 pandemic disrupted our services, and in response we implemented various temporary policies and business process flexibilities, which included accepting faxed applications as validly signed applications if they contained a legible, handwritten signature. Prior to this change, we did not consider any faxed applications as validly signed, and when we received one, we would contact the claimant to go over the provided information and obtain their signature. We generally contact the claimant to obtain their signature over the telephone (i.e., verbal attestation), as permitted by our alternative signature policy.

The decision to stop this process was not related to fraud, instead as the COVID-19 Public Health Emergency ended on May 11, 2023, we evaluated the flexibilities and decided to discontinue the fax option along with certain others. However, we still allow representatives to use the fax system to help their clients. Although we no longer accept faxed, signed applications as valid applications, we will continue to accept them as protective writings that establish a protective filing date if they meet the protective filing criteria. Upon receiving the faxed application, we will contact the claimant or a proper applicant, go over the information provided, and obtain a signature. In addition, advocates or representatives can continue to fax the SSI/SSDI Outreach, Access, and Recovery model consent or unsigned application to establish a protective filing date for claimants.

Comments Regarding the new iSSI Screens:

Comment #11: One commenter stated it was difficult to comment on the collection instruments or iClaim SSI questions because they are not shared as part of the Federal Register Notice (FRN), noting that previous announcements have included the screens.

SSA Response #11: SSA has never shared the collection instruments as part of the published Federal Register Notice (FRN), which is not the appropriate venue for sharing an information collection instrument. Rather, we always offer a link to our email inbox to request copies of the collection instruments when we publish an FRN. We provided that link in the published FRN, and routinely share the collection instruments when members of the public request to review them through an emailed request (or a request through the Office of the Federal Register's system). Per the published announcement, we ask that member of the public share the docket number of the Federal Register Notice with us when requesting copies of the collection instruments. SSA always publishes our notices in this manner. Respondents can still review and comment on the collection instruments during the 30-day public comment period.

Comment #12: One advocacy group noted that the current landing page for SSI for Children is helpful, and asked if this would be part of the journey for someone who wants to check eligibility for a child when using iSSI.

SSA Response #12: The current landing page for SSI for Children is [Supplemental Security Income \(SSI\) | SSA](#). Depending on how a user accesses SSA.gov (direct hyperlink, QR code, search engine search, starting at SSA.gov homepage, etc.), SSA's goal is to make this page accessible to those who want to learn more about potential eligibility for SSI for minors. Therefore, we include the link to Supplemental Security Income (SSI) | SSA on other starting places on our website including [Apply for Supplemental Security Income \(SSI\) | SSA](#) and [Check eligibility for benefits | SSA](#).

However, at this time, we will not include Supplemental Security Income (SSI) | SSA as part of the journey for an iSSI applicant. For now, only adults using iClaim are able to use iSSI. We plan to include efforts to expand online functionality for child applications in future phases of the SSI Simplification project. In addition, we plan on implementing the streamlined SSI questions for the other service channels (i.e., in person or phone interviews, and paper form) and the technician-supported development process with future phases. Once we expand iSSI to include child applications, we intend to include the link for Supplemental Security Income (SSI) | SSA in the journey screens for iSSI.

Comment #13: One advocacy group appreciated how the application screens capture preferred language and time to call, but suggested that the “things to consider” link regarding whether to accept reduced retirement benefits while waiting for a disability decision needs clear but detailed information so that the respondent is making an informed decision. The advocacy group stated the same applies for screens asking about a start date for retirement benefits which may result in permanently reduced benefits.

SSA Response #13: SSA appreciates this feedback. We will consider reviewing the language for clarity and intend to include this idea as part of the survey to determine if further changes are needed.

Comment #14: One advocacy group suggested that the screen asking about intent to apply for SSI include enough information to help a claimant understand SSI and why they might want to apply.

SSA Response #14: Immediately before the intent to file question, applicants can click on a link to obtain information about the SSI program and eligibility requirements. In addition, the new SSA pre-screening tool presented prior to the online application provides an educative path for individuals to learn about SSI payments.

Comment #15: One advocacy group suggested that the “more info” link on the Medicare screen contain clear yet detailed information so the claimant can reach the right answer.

SSA Response #15: SSA appreciates this feedback. We will review the current language and consider ways to make it clearer in the future.

Comment #16: One advocacy group suggested that “First-Party” and “Third-Party” terms on the iSSI screens be defined if they will be public-facing.

SSA Response #16: First party refers to applicants who are filing for themselves. Third Party refers to individuals who are assisting a first party applicant file for benefits. Although the terms first and third party are for internal SSA usage and does not impact the quality for service we provide, we will add the information to the Internet Claim (iClaim) pages.

Comment #17: One advocacy group expressed appreciation for the student iSSI question, however, they assumed it was regarding whether the Student Earned Income Disregard or Federal Work Study applies.

SSA Response #17: To clarify, the response to this question helps technicians determine next steps if the claimant alleges wages and appears to be ineligible based on their total income. We appreciate this feedback and plan to review the language on our website to ensure it is clear.

Comment #18: One advocacy group asked how the resource screens will separate out cash that is the current month’s income.

SSA Response #18: SSA does not expect to revise the questions regarding resources and monthly income. We are not currently expecting a policy change that would impact the public regarding how we count cash specifically, or any changes to the monthly income requirements. Rather, we are simply asking these questions as part of the iSSI screens. We intend the information we collect through the online service channel to help technicians identify eligibility prior to sending the claim for medical determination.

Comments Regarding the Requirements of the new iSSI Process, and the Current SSI Application

Comment #19: Some commenters expressed concern that SSA has not clarified the information needed during initial contact (either in person, or via the new iSSI process). They suggested that SSA should allow the claimants to know both what they will need up front when completing the SSI application, or new iSSI questions. In addition, they suggested SSA inform respondents of the information they will need to supply upon recontact (if needed), as well as the timing for that recontact so that the respondents can have the information ready.

SSA Response #19: SSA will consider this request as we continue to update the new iSSI system and simplify the application process for respondents. We will consider the information we can provide to online applications as to the next steps in the application process.

Comment #20: Two advocacy groups commented on the dynamic pathing for iClaim and the iSSI application questions. They noted that, overall, this is a positive development for the respondents, as it should ensure they do not need to answer questions that are not relevant to

them. At the same time, they expressed concern that the system may keep respondents from answering pertinent questions about their disability which could keep those respondents from meeting SSA's requirements for SSI payments. One advocacy group would prefer SSA err on the side of caution and ask more questions on the iSSI application than fewer to ensure the applicants provide as much information as possible regarding their disabilities, even if some of those questions seem unnecessary. The other suggested that SSA make public how the dynamic pathing process works.

SSA Response #20: The dynamic pathing used in iClaim applies to all benefit applications, or SSI application questions and not to medical determinations. The dynamic pathing allows the system to only display applicable questions for the individual based on the responses that individual already submitted through the system. For example, if an individual is answers "No" to the question "Are you married?" the system does not present any questions about marriage. Similarly with other questions such as answering "No" to questions about working, the system does not display questions about employers. As part of future releases, we plan to include additional information to help educate applicants about the process and its requirements. We intend to utilize further testing and additional feedback to ensure the educational information we provide, and pathing are clear and easily understood.

Comment #21: Some commenters noted that the simplified iSSI application leaves out information which may later become necessary to obtain. While these commenters support the concept of the simplified, online application, at the same time they expressed concern that several applicants who use the new iSSI application and then require later contact may be denied SSI if SSA is unable to recontact them later. Therefore, these commenters suggest it is more beneficial for both the respondents and SSA, if the simplified system obtains all the information needed up front.

SSA Response #21: Phase I of the iSSI effort is only the first step to simplify the SSI application and development process, and it does not change SSA's policy for collecting the required information for the application as appropriate. Rather, it focuses on limiting the initial information we collect to what SSA requires to determine when a claim can be sent for a medical determination. Once we have the SSI application and medical forms completed online, the field office technicians review the responses and forward the claim to the DDS for a medical review. If at any point SSA or the DDS notes that we need additional information from the applicant, the SSA or DDS technician contacts the respondent through telephone and mail. We make several attempts to contact the respondent, or the person who submits the request on their behalf when permitted, so that SSA can obtain any missing information. Even so, we expect to need fewer recontacts for those using iSSI who also fill out the subsequent forms through iClaim (most notably the i3368, OMB No. 0960-0579, and the i827, OMB No. 0960-0623).

As we continue to develop the streamlined application process, we plan to consider all filing suggestions, as well as the information we require from applicants and the methods we use to obtain the information, ensuring we are collecting the application information in the most efficient manner.

Comment #22: One commenter noted that SSA.gov’s online resource to “Check for Eligibility” includes only two questions, and asked how successful this tool is for determining how many people qualify for benefits.

SSA Response #22: We intended the information provided on [Who can get SSI | SSA](#) webpage to be an easy way for users to quickly self-assess potential eligibility for SSI payments based solely on their current monthly income. The SSI program has many complex rules, and this tool does not evaluate the user’s resources, living arrangement, etc. We only intend for this page to provide general information about potential eligibility; formally determining SSI eligibility requires the user to file an application for SSI to receive a formal decision.

Comment #23: One commenter asked why SSA spent “millions of dollars on marketing” just to have the SSI application remain “status quo.” Similarly, another commenter suggested that the addition of the iSSI questions does not pose a real change in the process, as many field offices will still recontact the respondent to submit the remaining information from the SSA-8000, even if they complete the iSSI questions. According to the commenter, this suggests that SSA has not committed to a fully online process for the SSI Application.

SSA Response #23: The SSI program is vitally important for the public. Due to the decrease in SSI applications during the COVID-19 pandemic, we did not wait until we were able to develop a streamlined SSI application to begin outreach to potentially eligible individuals. To increase awareness of the SSI program, SSA invested in our SSI marketing campaign including sending SSI mailers to current Title II beneficiaries who may have been eligible for SSI.

We also respectfully disagree with the assertion that iSSI represents no change from our current process. We view our multi-step SSI effort as a simplification of the SSI application process that we will implement in phases, with each phase adding more flexibility to the process. The first Phase focuses on providing a streamlined online SSI application that includes SSI-specific questions. The online application captures basic eligibility requirements and limits the initial information we collect up front. Based upon the public comments we received to the FRN, for future phases we plan to bring this simplified hybrid approach to in-office and phone interviews, as well as paper forms, ensuring that all SSI applicants will be able to benefit from our simplification efforts. We also plan to implement the new technician-supported development process, which limits the amount of information we collect directly from the public when developing for eligibility and payment amounts. Another phase we intend to explore is for a mobile application that anyone with online access can use. The agency’s goal for the end product of this multi-phase effort is a simplified SSI application process across all service modalities that allows an individual to choose whichever service modality works best for them. We will continue to assist our most underserved communities while remaining committed to simplifying SSI.

Comment #24: One commenter mentioned that iSSI will need more information from individuals who cannot authenticate, and they noted that SSA states we will contact those who cannot use the iSSI system later. That commenter asked that SSA clearly state the

extra information those individuals will need in the online application process, noting that it can be difficult for SSA to obtain extra information from claimants at a later date, especially if those claimants are homeless, or do not have reliable phone, Internet, or mailing addresses.

SSA Response #24: SSA appreciates this recommendation. As part of future enhancements to SSI, we will include additional information to help educate applicants as to the process and requirements. We will also conduct further testing and obtain additional feedback to ensure the educational information we provide is clear and easily understood.

Comments Regarding Restrictions on the iSSI Process and Basic Eligibility Questions:

Comment #25: Several commenters asked the agency to clarify the basic eligibility questions and developmental questions.

SSA Response #25: We based the streamlined basic eligibility questions on the deferred application. However, we modified the questions to collect information about the claimant for SSA to determine if the claimant meets the basic eligibility requirements in the first month covered by the application. The basic eligibility questions include:

- Identity and contact information e.g., name, address, phone number, etc.;
- U.S. Citizenship or qualified alien information;
- Place of residence i.e., Living in the United States (one of the 50 States, the District of Columbia, or the Northern Mariana); and,
- Income and resources Information.

The current SSI application process collects both the basic eligibility and developmental information which we use to determine eligibility and calculate payments. The first Phase to streamline the application process simplifies the basic eligibility questions and also limits the questions asked prior to a medical determination. Although we must continue to collect all relevant information to make a determination of eligibility and payment amount, these changes will help ensure we collect information in the most efficient manner, at the time we need it. Therefore, we will ask development questions after the DDS determines a medical allowance. Development provides the additional information or evidence needed to confirm eligibility and determine monthly payment amounts.

Comment #26: Several commenters asked for clarification on the process. One asked what benefits this process offers. Some of these commenters asked if respondents who complete the simplified application will need to complete the remainder of the questions elsewhere. Another asked whether, after completing the simplified application, the applicant will have additional contact with SSA while the claim is sent to DDS for processing. The same commenter also asked about the process once a medical decision is returned to SSA.

SSA Response #26: The goal of the SSI Simplification effort is to streamline the application questions to establish basic non-medical eligibility and defer additional development questions until after the DDS completes the medical review. However, we may contact some

individuals after they submit their applications to request clarifications or to obtain the medical report and required medical release (if the respondent did not submit those electronically).

In using the basic eligibility questions, SSA eliminates the need for respondents to answer developmental questions they would not need to answer until after the medical determination. Upon receiving the streamlined online application, technicians can quickly evaluate the information provided to determine if there is anything that needs clarification or further discussion. If the technician determines no need for clarification or discussion, the technician will forward the case to the DDS to start their medical evaluation. Hence, iSSI will expedite the application process compared with the current process. This process sets the foundation for a simplified application process for all individuals and modalities.

Depending on individual situations, we may collect additional information prior to the medical evaluation or as the medical evaluation is in progress. This simultaneous process helps eligible claimants receive payments faster.

For many claimants, we will not need to recontact them prior to the medical evaluation. However, there will be situations where SSA employees may contact claimants to clarify the information provided on their SSI application or to obtain medical information.

Once the DDS makes a medical determination, a technician will contact claimants who receive a medical allowance to timely update non-medical eligibility information and collect required evidence to calculate payments (consistent with additional information listed on the paper SSA-8000). Individuals who do not meet the medical requirements will receive an initial determination notice by mail and will not need to provide additional information.

Comment #27: One advocacy group asked what the processing mechanism is for respondents who apply with the iSSI application but do not provide all required information, and whether the respondent would be required to revert to the longform paper filing.

SSA Response #27: The streamlined iSSI application requires applicants to answer all of the questions to electronically submit it. Therefore, there will not be any situations where SSA receives an incomplete iSSI application. However, if one or more of the application responses indicates ineligibility, technicians may contact the claimant to collect the information necessary to clarify the questionable eligibility issue(s). This contact will not require the claimant to fill out the longform paper application. Rather, the claimant will need to provide the information necessary to clarify the questionable issue(s).

Comment #28: One advocacy group asked if priority would be given to iSSI applicants, thereby causing delays for many who do not have access. This group also asked where in the queue a claimant would go if they submitted an incomplete iSSI application.

SSA Response #28: SSA does not prioritize the processing of claims based on filing methods. However, claims that include certain characteristics, such as a terminal illness, are flagged for priority handling as their medical conditions are time sensitive. We prioritize

such claims regardless of how they filed. Regarding the receipt of an incomplete iSSI application, the Internet application system requires the respondent to answer all the questions to be able to electronically submit it. Therefore, there will not be situations where SSA receives an incomplete iSSI application. However, some individuals may be contacted after submitting their application to provide clarifications or obtain the medical report and the required medical release (if they were not electronically submitted).

Comment #29: Given that the Federal Register Notice mentioned that the new iSSI screens will only ask basic eligibility questions and defers the development of other non-medical and medical eligibility to later in the process, one commenter asked how the new iSSI process will impact all SSI applicants.

SSA Response #29: We understand there may be some confusion as to how we will implement this first phase of the SSI Simplification effort. Under Phase I of the SSI Simplification effort, we are submitting an expansion to the iClaim Internet SSI application (iSSI) to:

- allow some individuals to file for SSI online, including some non-U.S. citizens;
- add basic eligibility questions (i.e., information about their income, resources, and present living situation for one month only); and,
- limit the development that technicians need to complete.

While the new process still requires development for medical eligibility after the respondent submits the iSSI application, the new process will decrease the overall time burden for those applicants as the initial portion of the SSI application is much simpler. Although Phase I will only impact individuals filing online, future Phases will focus on expanding the use of the simplified SSI questions to in-office and telephone interviews, and paper forms for all applicants so that every applicant will be able to benefit from simplification. In addition, we plan to implement the new technician-supported development process which limits the amount of information we directly collect from the public when developing for eligibility and payment amounts.

Comment #30: Some of the commenters noted that respondents are not eligible to use the streamlined iSSI application (or current iClaim system) for child SSI applications. These commenters referenced statistics showing a decline in child SSI applications since 2020, as well as a request to the agency to do more outreach toward disabled children. They expressed concern that the inability to file children's SSI claims online further exacerbates this issue. One commenter asked for clarification regarding whether SSA will take child applications under the new iSSI process.

SSA Response #30: Although the listed requirements do not include the minimum age to use iClaim (i.e., age 18), the information in both the published Federal Register Notice and on the new iSSI screens indicates that this is for an adult application only. We appreciate the concerns expressed about the need to include child applications in the simplified application process. Based on these and other similar concerns expressed by the public, future Phases will focus on implementing the simplified application for in-office and phone interviews, and

paper forms for all SSI applicants, including children; we also expect to expand the use of the simplified application online as we implement future phases.

Comment #31: Several commenters expressed concerns about the limitations on access to the new process for all SSI applicants. A few commenters expressed concern that SSA is limiting iSSI to those aged 18-64 who are not married, have no children, and have not applied for or received SSI previously, thus preventing some children and older adults from using iSSI. These commenters stated that they found no statutory authority for treating children or older adults differently from adults aged 18-64 in the application process. They also noted that there is no specific online option for adults aged 18-64 who don't fit the narrow profile SSA is using for the new iSSI platform. One commenter asked SSA to explain why more claimants could not be added to the online channel. These commenters are concerned that those who have applied for or received SSI benefits and were then denied SSI in the past cannot use the iClaim or new iSSI application and believe that SSA should allow for these respondents to use iSSI as well.

In addition, one advocacy group pointed out that the first Phase of iSSI excludes a large pool of potential applicants, including prior applicants, the elderly, children and married or divorced persons. They stated that these applicants constitute a very large percentage of potential SSI applicants who will be forced to use the unnecessarily complex alternatives to apply,. They mentioned that this means many SSI applicants still do not have any access to SSA interviews or applications online and noted that SSA's rollout of both tools seems to indicate an unfortunate lack of concern for SSA's most at-risk claimants.

SSA Response #31: To more quickly release an online simplified SSI application process, the agency chose to leverage its existing technology, namely iClaim, which has existing limitations on who can use it. Rather than delay release of a simplified online option until we could create a new platform available to all types of claimants, the agency is choosing to release iSSI for individuals who can currently use iClaim. Future Phases will focus on expanding the simplified SSI application to other modalities, and on exploring the online option to individuals using their cellphone device (i.e., mobile application).

Comment #32: Several commenters noted that many respondents may submit multiple SSI applications for various reasons (e.g., they may be ineligible at first, but then meet the eligibility requirements; they may have received a previous denial but choose to apply again and supply more evidence; they may have been previously unrepresented, but now have representatives, etc.), and some of those do not have stable mailing addresses. These commenters are concerned that the new iSSI process restricts access for these individuals.

SSA Response #32: We understand the concern that many individuals, including prior applicants, will not benefit from the initial release of the new iSSI process. The second future phase of our simplification efforts we plan to bring the simplified application process to other modalities (in-person, phone, and the paper application) so that every applicant will be able to utilize the simplified process. In addition, we expect to expand the use of the Internet process to more respondents in future phases.

Comment #33: Some commenters mentioned that the requirement for potential users of iSSI to first create a mySSA account is a barrier for many people with cognitive disorders or memory loss, as well as for those who are homeless or transient, and may have multiple addresses associated with them. These commenters requested that SSA not require the use of a mySSA account or the same level of authentication for the mySSA account for the new iSSI pathing in iClaim, as it would allow more people to complete the online application. They also suggested that SSA should allow an easier authentication (or no authentication), and no requirement to use a mySSA account for Social Security Disability Insurance (SSDI) claims as well.

SSA Response #33: Based upon the feedback received from applicants and third-party assisters, SSA will continue to allow applicants to file online applications without creating or using mySocialSecurity (mySSA) account. We will continue to consider feedback about the needs of our disability applicants as we move forward in our SSI simplification efforts.

Comment #34: One commenter asked how SSA plans to ensure that the claimant signs and returns the application via mail, without fraud, in situations where there is a third-party filer.

SSA Response #34: SSA collaborates with many third-party helpers that use the Internet application to assist the public. Upon submission of the application that a third party provides, the system alerts technicians of the application and they contact claimants to obtain a verbal signature through an attestation process. During that process, SSA verifies the claimant's identity to ensure they are the claimant. In situations where we are unable to contact the claimant and, subsequently, we receive the signed application via mail, technicians review the information and do follow up with contacts to clarify information.

Comment #35: Several advocacy groups commented on third-party assisters and signature requirements:

- One advocacy group noted that SSA is allowing third-party assisters to use the new iSSI screens to apply for an applicant. However, the system does not allow the third-party assisters to sign on behalf of the applicant. Rather, the system requires the applicant to either physically sign the application, or verbally attest to its contents (in person or via telephone). This seems like an unnecessary step for the applicants. In addition, this advocacy group noted that in their experience, claimants still have difficulty receiving mail, and a required phone call from the field office may also be problematic for those applicants who are homeless or transient and are harder to contact.
- Another advocacy group noted that SSA still requires a “wet” signature on the SSI application for those respondents whose applications are completed by a third-party helper or representative payee. They noted that this would then require SSA to send the application to the applicant, which can be an issue, as the applicant may lose the mailed form, or misplace it. They expressed that this is overly burdensome on the respondents when the SSI application is already a difficult process, and wanted to know why SSA cannot institute electronic signature for the applicant in iSSI when a third-party completes the application on behalf of the respondent.

- A third advocacy group noted that creating a clear path for third party assisters to provide electronic signatures will ease the burden on the applications and will likely improve the quality of their applications.
- Finally, a fourth advocacy group noted that if a representative is already validated and verifies that they are truthfully completing an application with a claimant on the claimant's behalf, then SSA should not need to require an additional costly step such as a wet signature. This advocacy group also noted challenges that may arise in obtaining claimant verbal attestation or signature. These advocacy groups all suggest SSA explore allowing claimants to sign into their third-party prepared application at a separate time to complete an eSignature.

SSA Response #35: We only require wet signatures if claimants are submitting the paper version of the SSI application. This category includes the mailed copy of the online application which a third party submits. SSA regulations at 20 CFR [404.612](#) and [416.315](#), discuss the requirement for claimants to sign their application, which limits who can sign applications. However, to provide alternatives to the wet signature process, SSA created other signature methods that respondents can use in lieu of wet signatures. One of the alternative signatures methods is to contact claimants via phone to conduct an application interview, collect the required information, and obtain their verbal signature. For this situation where the third party already submitted the online application, this phone process is much shorter as technicians contact claimants only to verify the provided information is accurate and to get their signature over the phone. However, we understand the concern regarding the telephone recontact, and the request for SSA to allow for the claimants to sign the third party submitted application electronically at a separate time. We plan to research this option and consider it for future phases of this project.

Comments Regarding SSA's Policy for Allowing Simplification of the SSI Process:

Comment #36: Several commenters asked about the legality and equality of collecting different information depending on the modality of application, and asked what policy supports the change for the streamlined iSSI. One commenter suggested that only simplifying the Internet application could be discriminatory. Another commenter questioned whether it is legal and equitable to offer a streamlined application online and not in person, asserting this could violate laws and affect access to the SSI program. This commenter suggested that the new online system may be more user-friendly than the current in-person interview methodology and suggested that respondents using the new system may face fewer denials. In the commenter's estimation, then, the online-only streamlined system would set up an illegal disparity between the various methods. The commenter also suggested this perceived disparity would violate the Rehabilitation Act, as the commenter viewed the in-person or telephone claimant methods as being a much longer, more cumbersome process.

In addition, advocacy groups also expressed their concern in this area. One advocacy group noted that there is no statutory basis for treating children and elders differently in the application process and noted a concerning decline in SSI applications and awards for

children. Another advocacy group highlighted additional individuals who, unfairly, would not be able to use the iClaim system to apply for SSI.

SSA Response: #36:

Our current regulations do not preclude the use of a hybrid system, as is shown by our current process where we often obtain initial paper forms from third party assistors and then need to contact the SSI applicant directly to obtain their verbal attestation as their signature. This new process merely allows for a simplified electronic process which will function in much the same way, but make it easier to apply for SSI, and increase access to the SSI program. Phase I of SSA's SSI simplification efforts will create a more robust online SSI application through iClaim while at the same time implementing a hybrid application process that will serve as the framework to simplify the SSI application across all service channels. We intend Phase I to be the first step in a multi-phase effort to simplify the SSI application process. While Phase I will only be accessible to adults ages 18-64, we expect to expand iSSI to more applicants in future phases. We do not see this as discriminatory, as this is just the first phase of the multi-phase effort to simplify the SSI application and establish the online modality. Once we complete phase I, we will focus our efforts on bringing the new hybrid process to in-person and telephone interviews, as well as to our paper application. This will ensure that every applicant, including children and the elderly, can utilize the simplified process. Future phases can then focus on eliminating any technical barriers for all respondents to use an electronic modality for the SSI application. In the meantime, while we will maintain two processes, our expected next phases of this project will ensure that all respondents use the same simplified process in the near future, regardless of the modality. Our current process for reviewing and assessing applications remain the same, regardless of the modality the respondent uses to submit the application. This is true for our current modalities and will not change once we implement the iSSI simplified process. We do not expect the number of approvals or denials to change based on modality the respondent chooses to use to submit their SSI application.

While we are in the process of implementing this multi-phase project to simplify the SSI application, we will ensure that all respondents are treated in the same manner, regardless of the modality they use to submit the application, and we will continue to focus on expanding the use of the hybrid process to all modalities to allow access to as many respondents as possible. In addition, we will continue to revise the electronic process to allow for all respondents to use the new iSSI hybrid process through the Internet.

Comment #37: Two commenters expressed concerns regarding the new iSSI system and the expected changes to the SSI program. One commenter noted that SSA's Federal Register Notice (FRN) claims we are simplifying the SSI program, but all SSA is doing is updating an existing service delivery channel that is rarely used currently, and, per the new FRN, will only be available to a limited number of respondents under the new iSSI process. In addition, this commenter also referenced the questions that the Senate sent to SSA (in a letter dated August 2023³) regarding the vision for SSA's new SSI Simplification process, asserting that senators and anyone who read those questions, or noted the agency's responses

³ See Attachments A (Wyden-Brown-Casey (Senate) Letter to SSA – SSI Application) and B (SSA Response to Reps. Wyden-Brown-Casey (Senate) - SSI Simplification and Online Application)

to them would also believe that SSA intends to both simplify and overhaul the SSI program. This commenter further opined that, per the description in the FRN, and the limited changes on the new iSSI screens, SSA is not delivering on the expectations for the SSI Simplification progress. The commenter questioned why SSA is not adhering to the vision for iSSI from the response to the Senate, and as part of the progress in creating that vision, also asked why SSA is not updating policy to support that vision. Another commenter noted they expected a new SSI application (not just the new iSSI questions), and asked SSA to explain the challenge of creating a new form.

SSA Response #37: The SSI program complexity is rooted in the current laws that mandate extensive eligibility requirements, which also must be determined on a month-to-month basis. Within that framework, we are simplifying the eligibility questions initially asked in the online service channel as the first step towards providing a simplified application for all service channels, including a paper form. We are in the process of evaluating what information we may need to make an accurate initial payment determination without:

- Increasing the burden to the public or field offices,
- Jeopardizing the accuracy of our determinations, and
- Affecting other business processes.

SSA is using a multi-phased approach to the SSI Simplification process. While the most significant policy change for the first Phase is the creation of a streamlined iSSI application that contains eligibility questions, the agency intends for the next Phase to expand the use of the streamlined application to in-office, phone interviews, and paper forms for all applicants. In addition, we intend to implement the new technician-supported development process which limits the amount of information we directly collect from the public when developing for eligibility and payment amounts. We concur that the new iSSI process does not affect the current regulations pertaining to SSI; however, it is only the first step towards meeting SSA's vision for SSI Simplification. For Phase I, we will provide policy guidance and processing instructions to SSA and DDS staff upon the implementation of the online application. In future phases of this project, we expect to expand further in other modalities (e.g., telephone and in-office interviews, as well as expanding the Internet platform to more respondents) to help reach SSA's goals for the SSI Simplification process.

We will continue to identify and draft changes to policy throughout the SSI Simplification effort and upon the implementation of the streamlined SSI application throughout the other service channels. Through these incremental changes, we will continue to work toward the vision we previously described to the Senate.

Comment #38: One commenter questioned whether SSA can legally force respondents to complete all questions to have a valid application for SSI benefits, questioning whether respondents can submit a partially completed application through any modality which SSA will accept (in that it would provide a protective filing date, and SSA would not require the respondent to complete further questions). In addition, this commenter requested more information as to whether the submission of a partially completed application would trigger a technician to follow up with the respondent, or if SSA would simply disregard the application. The commenter pointed out that during a personal interview with a technician,

the respondent may not need to answer every question on the SSA-8000 as the technician may use the SSA-8001, deferred application, instead, which asks significantly fewer questions. In addition, the new iSSI asks even fewer questions than the current deferred application, which is unfair to the respondents who choose to use other modalities to apply for SSI. Therefore, SSA should take the same iSSI revisions into account for all modalities of the SSI application.

SSA Response #38: SSA does not force anyone to complete the SSI application, or any other SSA public use forms. However, to receive SSI payments, we require respondents to complete application questions so that we are able to make a determination and provide SSI payments to those who meet the eligibility requirements for SSI. We consider an application valid or complete if it is: on the prescribed application form (any modality); signed beneath the penalty clause by the applicant; filed with SSA; and the applicant is alive when the application is filed. If the applicant does not provide the information requested on the form, or any additional information SSA requests that the applicant submit with the application, it could impede SSA's ability to process the claim. Regardless of service modality, SSA requires the same information from all respondents to meet eligibility for SSI and receive payments. While we can accept partial responses in any modality for an SSI application, SSA technicians would have to follow up with the applicant to obtain the remaining necessary information through a telephone or in-person interview. While the new iSSI modality asks only the basic eligibility questions, we also expect respondents using the iSSI platform through iClaim will also simultaneously submit further information regarding their disability and medical history through the i3368 (OMB No. 0960-0579), as well as their authorization to allow SSA to contact their medical providers through the i827 (OMB No. 0960-0623), all of which are part of the iClaim pathing. Therefore, we expect respondents using iSSI will submit all of the necessary information. If, however, the iSSI respondents do not complete the necessary information, SSA technicians will contact them via telephone to obtain any remaining, required information for the SSI determination.

For the next Phase of this effort, SSA will bring the hybrid approach to all service modalities. In future phases, we will also expand the use of the Internet platform to more respondents.

Comment #39: One commenter asked what the agency is doing to work with Congress to reduce the legal requirements, and therefore burden, on the claim process. Another commenter asked about streamlining the SSI rules for in-kind support and maintenance (ISM), referencing proposed rules we had previously mentioned publicly (in a Unified Agenda).

SSA Response #39: Any possible changes to SSI legal requirements requiring legislation are within the purview of Congress, and as such only Congress could comment on them. Regarding the three ISM regulations referenced by the commenter, as of April 19, 2024, we published Final Rules for all three ISM policies in the *Federal Register*⁴. The effective date

⁴ The [Omitting Food from In-Kind Support and Maintenance Calculations final rule](#) published on [March 27, 2024](#) ([Federal Register :: Omitting Food From In-Kind Support and Maintenance Calculations](#));

The Expansion of the Rental Subsidy Policy for Supplemental Security Income (SSI) Applicants and Recipients final rule published on April 11, 2024 ([Federal Register :: Expansion of the Rental Subsidy Policy for Supplemental](#)

for these three rules' provisions (including changes to associated information collection tools) is September 30, 2024.

Comments Regarding SSA's Multi-Year Plan for SSI Simplification:

Comment #40: Several commenters asked if or when iSSI would be expanded to allow for greater usage. One commenter asked SSA to expand on the specifics of our multi-year plan for SSI Simplification.

SSA Response #40: The first Phase of the multi-phase SSI Simplification project starts with the release in late 2024 to add the simplified basic SSI eligibility questions to the online disability application. It also enables non-U.S. citizens to file online. Future Phases will expand the use of the SSI simplified application and development process to in-office, phone interviews, and the paper form to all SSI applicants, as well as expanding the Internet platform to more respondents.

Comment #41: One commenter noted that the public can already apply for SSI online.

SSA Response #41: The current iClaim allows for applicants to apply for SSI in limited circumstances and does not collect information specific to SSI eligibility. The upcoming first Phase, iSSI release, will add SSI-specific questions to the online application and remove the restriction that prevents non-U.S. citizens from filing online, allowing for more individuals to use the online process to apply for SSI. SSA intends to reduce restrictions in future phases of this multi-phase and hybrid effort. However, in the next Phase, SSA will focus on expanding the use of the simplified application to in-office, phone interviews, and paper applications for all SSI applicants. This Phase will also include the new technician-supported development process which reduces the amount of information we directly collect from the public when developing for eligibility and payment amounts. Future phases will allow us to expand the use of the Internet iSSI screens to more respondents.

Comment #42: Some commenters compared the new iSSI online request to SSA's current online appeals system. They noted that iAppeals requires no authentication beyond name, SSN, and date of birth; requires very little in the way of follow-up information; and allows for the uploading of any required documentation. These commenters suggested that SSA expand iSSI to mirror these elements and allow for the uploading of the documents, such as evidence, needed for the SSI application.

SSA Response #42: SSA appreciates these comments and recommendations. The regulatory requirements and process for filing benefit applications is significantly different from iAppeals, as it requires information to make entitlement determination versus appealing a previously made decision. However, as we further simplify the SSI application process, we will consider these recommendations along with additional feedback we receive from applicants, representatives, and others.

Comment #43: One commenter noted that the numbers for the SSA-16 retirement application were included in the FRN, but the aged are not a listed population for iSSI. This commenter asked if there are changes to SSI for the multi-phase plan that will benefit the retirement population.

SSA Response #43: The first Phase of this effort is specific to non-aged adult individuals with a disability. Therefore, at this time this will not affect individuals filing for retirement benefits; however, we included all the burden information for the information collections under OMB No. 0960-0618 in this request, which includes the SSA-16, even though the SSA-16 is not used for SSI purposes. The next Phase will expand the use of the simplified SSI application to in-office, phone interviews, and the paper form for all applicants, which includes individuals age 65 and older. For future phases of the SSI Simplification process, we intend to also expand the use of the Internet iSSI platform to more respondents, including the aged.

Comment #44: Prior to starting the SSI Simplification process, SSA held discussions with members from the disability advocate community. Commenters who were a part of, or at least have knowledge of, these prior discussions with the advocacy groups expressed concern that SSA is pivoting from a larger change in how applications are taken to a subset of the deferred application. These commenters requested a rationale for the change, including the amount of time and resources spent on the simplification. One of these commenters asked SSA to confirm whether it spent more than three billion dollars in the past two years in IT, and to explain the reasoning for the costs. Another commenter referred to this as a hybrid approach of simplified SSI eligibility application and technician-supported development. A third commenter also asked if SSA intended to implement the two-pronged hybrid approach mentioned during the previous discussions with advocates. In addition, several commenters noted that the SSI applications do not meet the same plain language standard applied to written notices and only a trained SSA representative can interpret the questions to complete the application process with the respondents. These commenters wanted to know if SSA will use simplified, plain language questions in the new iSSI process and revise the paper form and interview process with a technician with the new, simplified questions.

SSA Response #44: We remain committed to the two-pronged, hybrid-approach shared with advocates. This first Phase is the first step to implement the streamlined SSI application that consists of capturing basic eligibility information while limiting the collection of developmental information if an individual is medically approved. At that point the technician will contact the claimant to obtain additional information to verify eligibility and calculate payments. The next Phase will expand the use of the simplified SSI application to in-office, phone interviews, and the paper form for all applicants. We are also planning on implementing the new technician-supported development process.

Regarding the costs for this process, SSA's investment information is available publicly as part of the agency's Benefits Modernization major investment in the [IT Benefits](#) section of the Federal IT Dashboard. Currently, the IT Dashboard shows a planned expenditure of \$26.34M for fiscal years 2022-2024. We are using a portion of this funding for the first Phase of our hybrid approach to add SSI questions to iClaim/iSSI. SSA will use that planned

funding for the future Phases for incorporating the simplified process in technician supported service channels, and the mobile-ready Internet modality. In future phases of this project, we will continue to build upon our efforts as we further streamline the SSI process in all service delivery channels and expand the use of the Internet platform for more respondents.

Comments Regarding Streamlining Other SSI Modalities:

Comment #45: Some commenters questioned the decision to invest in an Internet platform, asserting that the Internet channel has a poor return on investment (ROI) and asking if SSA looks at the ROI and conducts a cost-benefit analysis before investing in software.

SSA Response #45: The agency's budget is strictly monitored to ensure the public is getting the services for the funding provided. Part of this process requires review of return on investment or ROI information. For additional details visit the [IT Benefits](#) section of the Federal IT Dashboard. We also note that SSA used an existing platform, iClaim, for this phase of iSSI rather than building a new one.

Comment #46: A commenter inquired whether SSA's internal systems are leveraging the same timesaving and streamlined process of importing some existing information from SSA's files internally, since iClaim offers that timesaving and streamlined process for respondents. If not, the commenter asked if SSA will enhance their system to do so.

SSA Response #46: SSA's internal claim systems currently have functionality for leveraging and importing data within SSA records in the appropriate circumstances.

Comment #47: One commenter noted that the SSA-454 underwent transformation for all service channels simultaneously, and asked why the same was not being done for SSI.

SSA Response #47: The SSA-454, while still complex, is less comprehensive than an initial SSI application therefore, SSA was able to make simultaneous multi-modality changes. We also note that SSA did not make some changes to the paper version of the SSA-454 concurrently with the new i454, but rather we implemented them several months later. The work involved in streamlining SSI is more challenging because of the complexities in determining initial eligibility for the SSI program, meeting the medical requirements, and obtaining developmental information to calculate payments. However, as previously stated, we are committed to simplifying SSI through our multi-phase initiative starting with iSSI. We will continue to build upon our work in our additional phases to expand the use of the simplified application to in-office, phone interviews, and paper forms for all SSI applicants with the new technician-supported development process that reduces the amount of information we directly collect from the public when developing for eligibility and payment amounts. In future phases, we will also work to expand the use of the Internet platform to more respondents.

Comment #48: Some commenters were pleased that iClaim was being offered to non-U.S. citizens but asked why this is the only functionality being offered. They questioned what

SSA has been working on since the summer of 2022 (when advocacy meetings on this topic took place) and questioned what they saw as a lack of innovation.

SSA Response #48: SSA is looking forward to expanding the online service availability to non-U.S. citizens. In addition, SSA is being innovative in its transformation of the SSI process – a process that is incredibly complex. SSA has been working to simplify the complexities of the SSI process as a whole, not just to add SSI questions to the Internet platform. The first Phase of our SSI simplification process will not only allow for non-U.S. citizens to apply for benefits, but it also provides a user-friendly process to apply for SSI. As we stated previously, we will continue to build upon our efforts with future Phases where we will expand the use of the Simplified application to in-office, phone interviews, and paper forms. These Phases also include incorporating the simplified process in technician-supported service channels and the mobile-ready Internet modality and will allow us to work on further expansion of the Internet platform to more respondents.

Comment #49: A commenter asked when the SSA-3368 would be improved as well.

SSA Response #49: We are working on changes to the past relevant work period and associated portions of the SSA-3368 (OMB No. 0960-0579). We are evaluating changes to shorten the relevant work period, which is the period of time we consider when we determine whether an individual's past work is relevant for purposes of our disability programs. In addition, we are working on revisions to the SSA-3368 (all formats) that simplify the form. These proposed changes will make it easier for the public to understand our requests for information and provide the information we need for more effective adjudication. Once we are able to implement those changes, we expect to do so in all agency service channels for collecting the information.

Comment #50: A commenter asked when the public will be able to file for Medicare Part B benefits online.

SSA Response #50: In May 2020, SSA expanded enrollment for Part B benefits that allows an Online Special Enrollment Period (SEP) option based on Group Health Plan coverage. This provides an additional service delivery option for our customers who defer their Part B benefits due to being covered based on an Employer Group Health Plan, to enroll for their SEP online. In the future, we will consider more online expansions and enhancements for Medicare Part B.

Comments Regarding How SSA's new iSSI will Interact with Other SSA Applications

Comment #51: Some commenters suggested that SSA clarify whether and how other SSA online tools interact with the new iSSI screens. They also noted that currently applicants can use SSA's online ePFT tool (OMB No. 0960-0826) to request an interview for benefits, and suggested that SSA modify the ePFT tool to allow applicants the choice of requesting a phone call or continuing to finish their application online. They suggested that SSA implement a system under which the agency respects the first-recorded public filing date (whether through ePFT, a phone call, or other modalities) for applicants who initially request

a phone interview and subsequently decide they would like to complete the online iSSI application, in which case the system would automatically cancel the subsequent telephone appointment which the respondent created through ePFT.

SSA Response #51: As we prepare future releases related to our SSI simplification efforts, we will be working to ensure our products and systems interact to the benefit of the public and employees. Currently the iClaim system identifies pending appointments for individuals filing for Retirement or Spouse applications and offers to cancel the appointment if the individual desires to cancel it. This option was not originally expanded for disability applications as the appointment can be used to obtain additional medical information or records. However, as part of that effort, we will also explore options to offer appointment cancellations for disability applications. We will seek feedback from applicants and advocates throughout this multi-phase effort.

Comment #52: Two commenters expressed concerns over the compatibility of SSA's systems to ensure the information from the new iSSI screens propagates into SSA's current SSI Claims System and Consolidated Claim Experience (CCE) system, as well as to the respondents' electronic claims folders. These commenters requested more information regarding SSA's plans to modify internal software to handle processing the new simplified SSI application and the hybrid approach (where some respondents continue to use the current methods for submitting the SSI application, while others use the new iSSI screens), as well as any further enhancements to the iSSI screens.

SSA Response #52: As noted in the Federal Register Notice, Phase I of our multi-phase plan adds SSI basic eligibility questions from the user tested application to the online service channel. Just as the current iClaim system propagates responses into SSA's internal systems, the information the iSSI application collects (through iClaim) will establish an SSI claim in CCE and responses will propagate into the current SSI claims' pages as appropriate, which in turn, an SSA record is created and saved into the respondent's electronic folder. Phase II will use the basic eligibility questions for a simplified SSI application for in-office, phone interviews, and paper forms for all SSI applicants. During this phase we may evaluate additional changes to our internal software and adjust as needed; however, we will ensure that our systems are compatible with this new approach.

Comments Regarding eSignature Practices and Wet Signature Policies

Comment #53: A commenter cited the wet signature requirements of the current SSI application as an additional burden.

SSA Response #53: Currently we only require wet signatures if claimants are using the paper version of the SSI application. Even so, we rarely use the paper versions, since most respondents complete the application through a personal interview process (as explained below). SSA regulations (20 CFR 404.612 and 416.315) usually require the claimant or legal guardians (if the application is for a child) sign the SSI application. However, SSA accepts alternative signature methods in lieu of wet signatures. One of the alternative signatures methods is to contact claimants via phone to conduct an application interview, collect the

required information, and obtain a verbal attestation from the claimant in lieu of a wet signature. For applications filed online by third party helpers, the process is shorter as technicians contact claimants to verify the provided information is accurate and obtain their verbal attestation signature over the phone instead of waiting for a wet signature from the claimant. Finally, we note that we already consider the time it takes for the respondents to give their verbal attestation in the overall burden estimate we cited for the SSI Application in the Federal Register Notice (and the Supporting Statement for this information collection request).

Comment #54: One advocacy group asked that SSA clarify how representative filers will be treated, noting that the FRN discussed first-party filers and third-party assistors. This advocacy group noted that many SSI applicants need representatives to navigate the application process and that representatives are held to a high standard.

SSA Response #54: Representative filers will continue to be treated the same as third-party assistors, and SSA does not have any policies to hold anyone to a different standard. Hence, the online filing process will remain the same for claimants' representatives. They will continue to use iClaim as third-party assistors which allows them to complete and submit unsigned disability and SSI applications on behalf of claimants. Once the third-party assistors submit the application, claimants can review the information and either sign the mailed copy of the application or provide a verbal attestation over the phone.

Comments Regarding the SSA's Two Application Forms (SSA-8000 and SSA-8001):

Comment #55: Some commenters asked if SSA is basically creating a third SSI application, whether SSA would be retiring the SSA-8000 and SSA-8001, and whether the simplified application requires a new application number.

SSA Response #55: Yes, our intent is to have one Simplified SSI application that asks the basic eligibility questions and can be used through all service channels. The Internet SSI claim with basic eligibility questions is a curtailed version of the questions listed on both the paper SSA-8000 and SSA-8001 applications. The Internet modality and simplified iSSI screens are consistent with the paper forms. As we continue this multi-phase effort to simplify the SSI filing process, our goal for Phase II is to implement the simplified SSI application within office, phone interviews, and paper forms with the new technician-supported development process which reduces the amount of information we directly collect from the public when developing for eligibility and payment amounts.

However, currently the SSA-8000 and SSA-8001 contain the combined (eligibility and development) information that SSA needs to collect from the public when filing for SSI, regardless of the modality used to collect this information (i.e., paper form, SSA's internal claim system (CCE) or the Internet (iClaim/iSSI). Therefore, before we can retire these paper forms, we need to implement Phase II of the project to expand the new basic eligibility application in all service channels and streamline the full development process for determining current and prospective eligibility and payment amounts.

Comment #56: One commenter asked if SSA’s Systems component was funded in 2023 to deliver an update to the Intranet CCE screens with the new simplified eligibility questions.

SSA Response #56: With the upcoming advancements to iClaim to include SSI applications and non-U.S. citizen applicants, the agency anticipated changes to internal systems like CCE. SSA ensured there was adequate funding to develop the upcoming iClaim release along with connections necessary to guarantee communications between iClaim and current agency systems.

Comment #57: One commenter asked when the SSA-8001 will be updated to reflect the basic eligibility questions. Another asked if the agency will continue to maintain two versions of the SSI application.

SSA Response #57: The current paper version of the SSA-8001 application coincide with our internal system that technicians utilize for the interview service channel. Therefore, we cannot revise the paper application until we make the basic eligibility questions available on the other service channels.

Phase II will expand the new SSI application to all modalities so that there will not be different versions. At that time, we will also revise the paper form to reflect the revisions for consistency across all modalities.

Comment #58: One commenter asked for an example of prerelease from public institutions⁵ on the SSA-8000. Another commenter asked how it is fair for inmates to jump the line and have their cases processed faster before other applicants who provide responses through the regular application process.

SSA Response #58: The pre-release process stems from current law. Section 1631(m) of the Social Security Act states, “The Commissioner of Social Security shall develop a system under which an individual can apply for supplemental security income benefits under this title prior to the discharge or release of the individual from a public institution.” Under this process SSA may expedite an application from an inmate above others if that inmate was close to release. Otherwise, we do not expedite an inmate’s application. We note that the pre-release process for the SSI Application is a rare occurrence. We only process approximately 4,500 cases per year.

⁵ To ease their transition back into the community, a person can apply for SSI before being released from a public or private facility, such as a prison or mental institution. An institution may establish a pre-release agreement with SSA. This agreement allows SSA to work with the institution to start the benefit application process several months before the person’s scheduled release date. This will allow those eligible to receive timely SSI payments upon reentering the community. For example, Missouri Department of corrections has an inmate that will be released within 120 days. Missouri DOC already has a prerelease agreement set up with the local SSA field office (FO) with set procedures on how applications should be submitted. They submit the application on behalf of the claimant, which is reviewed by an SSA technician, and they send it to the Missouri Disability Determination Service (DDS) for a decision. If DDS makes a favorable medical determination, SSA will reach out to the facility and determine current projected release date of the claimant. If the claimant is released as expected, they will come to their local SSA FO to provide release paperwork. The SSA FO will conduct a pre-effectuation review to determine non-medical eligibility requirements and issue payment. For additional information, please refer to publication 05-10504.

Comments Regarding SSA's Messaging of Simplification Efforts to Congress, and SSA's Acting Commissioner's Support of the Simplification Efforts

Comment #59: One commenter asked if the new Deputy Commissioner of Operations will go before Congress to justify why there are no simplifications to the SSI process.

SSA Response #59: SSA remains committed in our goal to simplify the SSI process not just for applicants, but also for agency technicians. Providing an online SSI application that collects minimal basic eligibility questions to identify if an individual appears to meet the basic SSI eligibility requirements in the month of filing is the first step towards our hybrid approach. SSA is examining our internal processes and procedures to determine ways to streamline our technician workflows for Phase II. We are evaluating methods of obtaining necessary information other than detailed questions for the public to answer. We will continue to collaborate with Congress and stakeholders and to make agency leadership available to report our progress.

Comment #60: Commenters asked if Acting Commissioner Kijakazi supported this simplification approach.

SSA Response #60: Commissioner O'Malley approved the approach outlined in this Information Collection Request

Comment #61: One commenter asked if it would be in the public's best interest to accelerate the SSI Simplification timeline.

SSA Response #61: We acknowledge the importance of SSI simplification and the need to complete it as soon as possible. We are working as quickly as we can, but SSA's multi-phase plan for SSI simplification is dependent upon many factors including budget, staffing, and available technology. In addition, to ensure we have the best product in place for the public, we are taking the necessary time to complete usability testing and questionnaires to obtain feedback for further improvements.

Comment Suggesting a Program Grant

Comment #62: Two advocacy groups suggested that SSA create a Community Assistance Grant Program aimed at providing flexible funding for legal services organizations and community organizations that do not currently provide support to SSI applications. This funding would allow organizations that already have relationships with hard-to-reach communities to focus on, and assist in, SSI applications.

SSA Response #62: SSA appreciates the suggestion of a grant program. We intend to consider its feasibility.

b. 30-Day Comment Period Federal Register Notice (FRN):

The 30-day Comment Period FRN published on August 27, 2024, at 89 FR 68691. The comment period began on August 27, 2024 and will end on September 26, 2024, at 11:59pm. We will review and respond to any public comments we receive during the 30-day comment period FRN. If we receive any comments in response to this Notice, we will forward them to OMB and publicly post an updated Addendum addressing the comments.

Summary of Usability Testing of the Basic Eligibility Questions

Background

The Social Security Administration (SSA) held preliminary discussions and usability testing with the public regarding the Supplemental Security Income (SSI) basic eligibility questions we drafted for a simplified SSI application. The primary goal of the testing was to have the participants evaluate the language for clarity and obtain feedback on their interpretation of each question and any recommendations for making it more understandable. To find participants, SSA reached out to known external community-based advocates who assist vulnerable populations, SSA field offices for technicians who used their experience to evaluate the language, and utilized services from the “Fors Marsh” organization⁶.

We completed three rounds of usability testing in July, September, and November 2022, during which we tested the SSI questions we are adding to the new iSSI screens. We did not test the overall experience for the user starting with the iClaim disability application, including the new iSSI screens, and ending with the review of responses and submission screen for iClaim. However, based on our initial testing of the questions we are adding to the new iSSI screens in iClaim, we identified questions which will allow the respondents to use these new screens as part of the iClaim pathing to allow us to collect SSI eligibility information from the respondents, so we can avoid unnecessary recontact.

The following outlines the results of the three rounds of usability testing on the new SSI questions:

Usability Testing Sessions

Round 1 (July 2022):

- SSA scheduled each usability testing session for one hour.
- We conducted four (4) usability testing sessions with four (4) first party claimant participants provided by advocates.

Round 2 (September 2022):

- SSA scheduled each usability testing session for one hour.
- We conducted twelve (12) usability testing sessions with twelve (12) SSA technicians.

Round 3 (November 2022):

- SSA scheduled each usability testing session for one hour.
- We conducted thirteen (13) usability testing sessions with thirteen (13) first party participants provided by Fors Marsh.

⁶ [Marsh | Global Leader in Insurance Broking and Risk Management](#)

Nature of the Discussion

During the usability testing sessions, SSA facilitators guided participants through interactive wireframe screens that displayed new, rewritten, basic eligibility SSI application questions. We asked participants to provide feedback as to how they would answer each question. Participants compared alternative versions of questions and shared what they understood to be more effective. To obtain feedback on the maximum number of questions, participants provided feedback on language that may not have been applicable to their personal experiences (ex: family, citizenship status). While tests were focused on language comprehension, design discussion also naturally occurred (navigation, look and feel, etc.).

SSA then asked the participants a list of questions about their thoughts and experience going through the process. The questions focused on the overall thoughts, likes or dislikes, ease of navigating through questions; ability to complete questions without help, and what would they do if they were unsure of an answer.

Throughout each 1-hour session, the facilitator and participants focused on specific areas of some pages to obtain more detailed feedback. These areas of specificity focused on phrasing of language; usefulness of help text (e.g., on screen information boxes); and a deeper probe into the participants' understanding of specific pages (such as the "Income Sources" page and the text on the "Resources" page).

Feedback

Overall, the participants' feedback was generally positive. The participants noted that the questions the facilitators showed them were easy to navigate and had clear helper text.

First-party participants had the fewest concerns or issues. Claimants, Third-party participants, and SSA technicians, provided targeted concerns and issues based on their professional experience with the SSI and SSDI programs. Among the list of comments, we found four main themes:

- **Lack of comprehension with Content:** Some participants expressed confusion about some part of the questions that used technical or confusing terms (e.g., cash on hand, household), or unfamiliar concepts (i.e., immigration status of Parolee to a U.S. born citizen).
- **Confusion over "Why we asked":** Some questions did not seem immediately relevant to providing benefits. Participants wanted to better understand the purpose of the question or its answer choices. They also questioned our motivations for asking for certain information.
- **Feedback on application design:** Some questions were about the presentation or placement of information. In some cases, the participants did not notice a hyperlink to more information (or a help screen). Some participants wanted there to be a text box to explain their "other" response, or wanted a different control to respond, such as a checkbox. One participant said a question that pertains to the claimant's children seemed to be out of logical order.

- **Concerned with knowledge of response:** Some participant identified questions for which they may not easily know the answer. For example, in some cases, the applicant must estimate their data (e.g., disability onset).

Changes Based on Feedback

SSA evaluated and incorporated changes as appropriate based on user feedback from the usability testing which include but are not limited to:

- We added language to the income and resource questions acknowledging the respondent may only be able to provide a best estimate versus an exact amount.
- We created Income and Resource overview screens to display immediately before collecting income and resource questions to provide respondents some context as to why we ask questions about their income and resources. It also reminds the respondents of possible documents they may want to have on hand to help complete the questions.
- We replaced the self-employment and wage question with a general question that captures if the claimant is working and a conditional question that captures the type of income they receive from working (wages from employer, self-employment, or both).
- We added language (in the form of an information box) for the field collecting a disability onset date acknowledging the difficulty of providing a precise date and giving the user allowance to input their best approximation.
- We added three options for the number of vehicles (0, 1, 2 or more) instead of having respondents provide an actual number.

Looking to the future, once we implement the new iSSI screens in the iClaim pathing, we expect to conduct ongoing usability testing of the pathing and new screens to help us improve them. In addition, we will also implement a customer satisfaction survey for the new pathing to allow the public to submit real-time feedback on the screens. Through the ongoing feedback and testing, we expect to expand the usage of the screens and implement revisions as needed to improve them for the public.