

**Supporting Statement for
The enhanced Leads and Applications System (eLAS) and
iAppointment
20 CFR 404.630, 20 CFR 416.345
OMB No. 0960-NEW**

A. Justification

1. Introduction/Authoring Laws and Regulations

The Social Security Administration (SSA) uses the date we receive an individual's intent to file for Social Security Benefits, Medicare Part A (Health Insurance) or Supplemental Security Income as the application filing date provided the individual files an application within a prescribed period of time as defined in Sections *20 CFR 404.630 and 20 CFR 416.340-416.345* of the *Code of Federal Regulations*. We refer to the date we receive the intent to file as the protective filing date.

SSA technicians use the enhanced Leads and Applications System (eLAS) and iAppointment to document the protective filing date. SSA uses eLAS to document an individual's intent to file for benefits, or a third-party's intent to file for benefits on behalf of an applicant they represent, and schedule an appointment with the servicing field office of their choice. The Internet Appointment Application (iAppointment) is an online process that allows members of the public an easy-to-use method to schedule an appointment with the servicing office of their choice, which then interacts with the eLAS system. This request is a request to establish the eLAS and iAppointment collection tools under a new OMB approval number.

2. Description of Collection

SSA uses data collected by eLAS and iAppointment to document a protective filing date, issue notices to confirm an appointment date to file for benefits and provide time periods for filing, and issue informal denials for individuals who decide not to file for SSI.

Individuals or third-party representatives who contact SSA by phone or in-office about filing for benefits for themselves or someone else and who are unable to file the same day are provided the opportunity to file online or to schedule an appointment to file with an SSA representative. SSA employees collect information from these individuals and record their information in eLAS. Applicants and third-party representatives who attempt to complete an application online are provided the opportunity to use iAppointment to schedule an appointment to file for benefits with an SSA employee. Appointments made using iAppointment will propagate into eLAS.

Enhanced Leads and Appointment System (eLAS):

For an individual who contacts SSA via phone or in office regarding filing for

benefits, SSA explains their filing options. eLAS is a non-public facing system that allows SSA employees in the field offices, workload support units, and teleservice centers to schedule appointments and document an individual's intent to file using specific script that presents the same questions to each individual. If the individual requests an in office or telephone interview with an SSA employee, the technician schedules an appointment with the individual for a specific time and date. If an individual states that they intend to walk into their local field office, file online, or requests to complete a paper application, the technician documents the individual's intent to file to prevent a loss of benefits. The date the individual contacts SSA with an intent to file for benefits is referred to as the protective filing date. The SSA technician can use the protective filing date as the date of the application, provided the individual files an application within six months for Title II benefits, or within sixty days for Title XVI benefits. Once the technician schedules an appointment, the technician sends a confirmation notice that includes the appointment date, time, and location, as well as the date by which the individual must file the application to use the protective filing date as their application filing date.

In addition, once individuals begin receiving benefits, they may need to meet with an SSA technician regarding a post-entitlement event such as an overpayment, suspension of benefits, or a representative payee issue. SSA provides appointments for these post-entitlement events.

eLAS will interface with the new web-based claims system SSA is currently designing through our IT Modernization efforts.

Internet Appointment (iAppointment) Application:

iAppointment is an online process that allows members of the public an easy-to-use method to schedule an appointment with the servicing office of their choice. Since the application date can affect when a claimant's benefit begins, iAppointment establishes a protective filing date and provides respondents information related to the date by which they must file their application.

We offer iAppointment to individuals who either (1) attempt to establish an iClaim application but are unable to because they failed the initial verification checks, or (2) start iClaim but state their reading language preference is other than English. Individuals entering iClaim and selecting "apply for Benefits" are directed to **my Social Security** to provide their basic information (i.e., name, SSN, and date of birth) to match it to our records and authenticate their identity. If their information does not match, we provide an alert to verify the information and try again. After the third attempt, we provide a message that the information provided does not match our records, and offer two options: (1) schedule an appointment using iAppointment, or (2) call SSA at our toll-free number. Individuals entering iClaim and successfully passing authentication are allowed to continue in iClaim and provide us additional contact information, which includes language preference. If they chose any language

other than English, we provide a message with the option to schedule an appointment online or proceed filing the claim in English.

The iAppointment application propagates information the applicant already entered into iClaim for SSN, name, date of birth, and gender. However, applicants must provide minimal additional information: mailing address; telephone number; language preference; type of appointment (Disability, Retirement, Medicare); and whether they prefer a telephone interview or in-office appointment.

If the available appointment times do not meet the customer's needs, iAppointment allows them to enter a different zip code to identify another field office, which may offer different appointment times. At this time, SSA only allows domestic applicants to use iAppointment. If users indicate they are filing as third-party representatives, iAppointment provides a message directing them to call the National 800 Number for assistance. If a foreign applicant is unable to complete iClaim, iAppointment directs them to contact a Social Security representative, and provides a link to SSA's Service Around the World website.

The respondents are individuals and third parties who request to schedule an appointment with an SSA field office.

3. Use of Information Technology to Collect the Information

One of the purposes of eLAS and iAppointment is to document the protective filing date. The vast majority of users of this information collection are contacting SSA either via telephone or in a field office; in these cases, the SSA technician uses the Internet-based eLAS to document the protective filing date. We use iAppointment, by contrast, for specific users who are unable to complete an application via iClaim. Therefore, less than 1% of the respondents currently use the Internet application, iAppointment, to request an appointment. iAppointment represents an available electronic submission option for those already using the iClaim Internet application to attempt to apply for benefits. While eLAS is an internal system, it is specifically used for individuals who have not sought out an electronic or digital means of submitting their application information.

4. Why We Cannot Use Duplicate Information

Information collected in eLAS and iAppointment is collected with SSA's Modernized Claim System (MCS) for Title II and XVIII applications and the SSI claim system for Title XVI applications. The first time we collect person-centric data (i.e., date of birth, contact information) we store it in one of SSA's databases. When using a system application such as MCS, which collects person centric data, the information propagates into the claims path so that we are not requesting duplicate information.

5. Minimizing Burden on Small Respondents

This collection does not significantly impact small businesses or other small entities.

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

If SSA did not have this information collection, we would be unable to document a protective filing date for Social Security benefits, Medicare Part A or Supplemental Security Income that would be accessible to all SSA employees. This would lead to a loss of benefits and be a direct violation of the regulations established in the Code of Federal Regulations (*20 CFR 404.630 and 20 CFR 416.340-416.345 of the Code of Federal Regulations*). There are no technical or legal obstacles that prevent burden reduction.

7. Special Circumstances

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

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

The 60-day advance Federal Register Notice was published on January 6, 2021, at 86 FR 667, and we received no public comments. The 30-day FRN was published on March 12, 2021, at 86 FR 14170.

Correction Notice: The first Federal Register Notice shows incorrect burden information for this collection. We have corrected for this in the second Notice, in #12 below and on ROCIS.

If we receive any comments in response to this Notice, we will forward them to OMB.

9. Payments or Gifts to Respondents

SSA provides no payments or gifts to the respondents (except for actual benefits payments, if applicants qualify for them).

10. Assurances of Confidentiality

The information we are requesting is protected and held confidential in accordance with *42 U.S.C. 1306, 20 CFR 401 and 402, 5 U.S.C. 552* (Freedom of Information Act), *5 U.S.C. 552a* (Privacy Act of 1974), and OMB Circular No. A-130. Additionally, SSA protects the personal information it receives by adhering to our Internet Privacy Policy, which stipulates that:

- The public does not need to give us personal information to visit our site;
- We collect personally identifiable information (name, SSN, DOB or E-mail) only if we know beneficiaries or their representatives provided it;
- We use personally identifying information to administer our programs and to provide certain online services;

- We use web measurement and customization technologies to measure and analyze how our site is used and to customer user experience. We also use third-party vendors in our measurement and customization process;
- We may share personal information with our employees and contractors, who have a need to know the information within their job duties, and outside the agency, as authorized by Federal law.

11. Justification of Sensitive Questions

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

12. Estimates of Public Reporting Burden

Below we provide the annual burden estimates for the multiple components of this information collection. The chart below shows the burden information for the appointment scheduling aspect of this information collection request:

Modality of Completion	Number of Respondents	Frequency of Response	Average Burden Per Response (minutes)	Estimated Annual Burden (hours)	Average Theoretical Cost Amount (dollars)*	Average Combined Wait Time in Field Office or for Teleservice Center (minutes)**	Total Annual Opportunity Cost (dollars) ***
iAppointment	17,621	1	10	2,937	\$25.72*		\$75,540***
eLAS	5,885,731	1	10	980,955	\$25.72*	21**	\$78,213,517***
Totals	5,903,352			983,892			\$78,289,057***

* We based these figures on average U.S. worker's hourly wages (based on BLS.gov data, https://www.bls.gov/oes/current/oes_nat.htm)

** We based this figure on the combined average FY 2021 wait times for field offices (approximately 24 minutes per respondent) and teleservice centers (approximately 17 minutes per respondent), based on SSA's current management information data.

*** This figure does not represent actual costs that SSA is imposing on recipients of Social Security payments to complete this application; rather, these are theoretical opportunity costs for the additional time respondents will spend to complete the application. **There is no actual charge to respondents to complete the application.**

In addition, OMB's Office of Information and Regulatory Affairs (OIRA) is requiring SSA to use a rough estimate of a 30-minute, one-way, drive time in our calculations of the time burden for this collection. OIRA based their estimation on a spatial analysis of SSA's current field office locations and the location of the average

population centers based on census tract information, which likely represents a 13.97 mile driving distance for one-way travel. We depict this on the chart below:

Total Number of Respondents Who Visit a Field Office	Frequency of Response	Average One-Way Travel Time to a Field Office (minutes)	Estimated Total Travel Time to a Field Office (hours)	Total Annual Opportunity Cost for Travel Time (dollars)****
118,067	1	30	59,034	\$1,518,354****

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

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

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

We base our burden estimates on current management information data, which includes data from actual interviews, as well as from years of conducting this information collection (formerly under OMB Control No. 0960-0618). Per our management information data, we believe that 10 minutes accurately shows the average burden per response for reading the instructions, gathering the facts, and answering the questions. Based on our current management information data, the current burden information we provided is accurate. The total burden for this collection instrument is **983,892** burden hours (reflecting SSA management information data), which results in an associated theoretical (not actual) opportunity cost financial burden of **\$79,807,411**. SSA does not charge respondents to complete our applications.

13. Annual Cost to the Respondents

This collection does not impose a known cost burden on the respondents.

14. Annual Cost to Federal Government

The annual cost to the Federal Government is approximately \$21,358,100. This estimate accounts for costs from the following areas:

Description of Cost Factor	Methodology for Estimating Cost	Cost in Dollars*
Designing and Printing the Form	Design Cost + Printing Cost	\$0
Distributing, Shipping, and Material Costs for the Form	Distribution + Shipping + Material Cost	\$0
SSA Employee (e.g., field office, 800 number, DDS staff) Information Collection and Processing Time	GS-9 employee x # of responses x processing time	\$20,637,628
Full-Time Equivalent Costs	Out of pocket costs + Other expenses for providing this service	\$0
Systems Development, Updating, and Maintenance	GS-9 employee x man hours for development, updating, maintenance	\$720,472
Quantifiable IT Costs	Any additional IT costs	\$0
Total		\$21,358,100

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

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

15. Program Changes or Adjustments to the Information Collection Request

This is a request for a new OMB number for a collection OMB currently approved under OMB Control No. 0960-0618. We are creating a new OMB approval for this collection, as we use iAppointment for more than just initial applications using the SSA-1, SSA-2, and SSA-16. While this is not a new information collection, the overall public reporting burden for this collection has increased since the last OMB Notice of Approval in May 2020. This increase in burden hours is due to the addition of the eLAS Post-Entitlement appointment burden hours to the collection.

Previously, we did not use eLAS to set up appointments for respondents requesting Post-Entitlement appointments.

16. Plans for Publication Information Collection Results

SSA will not publish the results of the information collection.

17. Displaying the OMB Approval Expiration Date

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

18. Exceptions to Certification Statement

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

B. Collection of Information Employing Statistical Methodologies

This information collection does not use statistical methods.