

**Justification for Non-Substantive Changes to the
Consent Based Social Security Number Verification (CBSV) User Agreement
OMB No. 0960-0760**

Background of the collection:

The Consent Based Social Security Number Verification (CBSV) is a fee-based Social Security number (SSN) verification service. Users of the service sign a user agreement, complete a registration process, and submit query files to us through the CBSV internet or web service applications. We match the information against our files using a number holder's SSN, name, and date of birth. We return a response file that shows match, no match, or a death indicator to the service user.

CBSV User Agreement Changes:

- **Change #1:** We added the following definition of annual fee on **page 4:**

The Requesting Party must make an advance payment for annual compliance audit costs and the costs associated with creating and processing the annual SSA-1235 reimbursable agreement. The Annual fee can change at any time.

Justification #1: Our agency policy is to charge an annual fee. We did not previously have the definition of the annual fee in the Definitions list for the agreement. We are updating the agreement to include this definition.

- **Change #2:** We updated the language regarding the annual fee on **page 8:**

From:

The Requesting Party must pay the one-time \$5,000 initial enrollment fee in advance and make advance payment of estimated transaction fees for the current fiscal year prior to submitting any request for verification under this User Agreement. The Requesting Party must pay in full any remaining balance due for verifications from the previous fiscal year obligations before it uses CBSV for the following fiscal year. The Requesting Party may submit a request to SSA to make quarterly installments of advance payments. The Requesting Party must email the request, along with its agreement number, to SSA.CBSV@ssa.gov.

To:

The Requesting Party must pay the one-time \$5,000 initial enrollment fee in advance upon enrolling in the CBSV service. The Requesting party must also in advance pay the annual enrollment fee in addition to the estimated transaction fees for the current fiscal year prior to submitting any request for verification under this User Agreement. The Requesting Party must pay in full any remaining balance due for verifications from the previous fiscal year obligations before it uses CBSV for the following fiscal year. The Requesting Party may submit a request to SSA to make quarterly installments of advance payments. The

Requesting Party must email the request, along with its agreement number, to SSA.CBSV@ssa.gov.

Justification #2: The updated language clarifies that the annual fee is separate from the initial one-time enrollment fee. It also clarifies the responsibility of the Requesting Party to pay the annual fee prior to using the CBSV service each year.

- **Change #3:** We updated the language to include payment of the annual fee under Costs of Services item number 2 on **page 15**. We revised the language as follows:

From:

The Requesting Party must submit payment for transaction fees with a completed and signed Form SSA-1235 (Agreement Covering Reimbursable Services—Attachment D). Prior to the start of each new federal fiscal year, the Requesting Party must submit a new, signed Form SSA-1235, accompanied by the full payment of transaction fees for estimated requests for that federal fiscal year. The federal fiscal year begins on October 1 and ends on September 30.

To:

The Requesting Party must submit payment for the annual fee and transaction fees with a completed and signed Form SSA-1235 (Agreement Covering Reimbursable Services—Attachment D). Prior to the start of each new federal fiscal year, the Requesting Party must submit a new, signed Form SSA-1235, accompanied by the full payment of transaction fees for estimated requests for that federal fiscal year. The federal fiscal year begins on October 1 and ends on September 30.

Justification #3: The updated language clarifies that the Requesting Party must pay both the annual fee and transaction fees prior to renewing their annual use of CBSV. In addition, it also clarifies that SSA requests a new signed SSA-1235 each year when the respondents submit their annual payment and annual transaction fees.

- **Change #4:** We updated the language to include payment of the annual fee under Costs of Services item number 3 on **pages 15-16**. We revised the language as follows:

From:

SSA will credit the account of the Requesting Party and decrement from the advanced payment as services are rendered. SSA will provide services only if there are sufficient funds in the Requesting Party's account. In cases when estimated costs have changed, the Requesting Party must remain in active status as long as its account balance is positive. No interest will accrue to the advance payment.

To:

SSA will credit the account of the Requesting Party and decrement from the

transactional portion of the advanced payment as services are rendered. The annual fee will be applied to compliance audit and reimbursable agreement processing costs. SSA will provide services only if there are sufficient funds in the Requesting Party's account. In cases when estimated costs have changed, the Requesting Party must remain in active status as long as its account balance is positive. No interest will accrue to the advance payment.

Justification #4: The updated language includes a new sentence stating that SSA will apply the annual fee to the costs for compliance audit and processing of reimbursable agreements. This clarifies SSA's uses for the annual payment we are requiring of the respondents.

- **Change #5:** We updated the language to include payment of the annual fee under Costs of Services item number 4 on **page 16**. We revised the language as follows:

From:

At least annually, SSA will review its costs related to providing the CBSV services, recalculate the transaction fee necessary for SSA to recover full costs, and adjust the transaction fee accordingly. SSA will notify the Requesting Party before any change to the transaction fee goes into effect.

To:

At least annually, SSA will review its costs related to providing the CBSV services, recalculate the annual and transaction fee necessary for SSA to recover full costs, and adjust the annual and transaction fee accordingly. SSA will notify the Requesting Party before any change to the transaction fee goes into effect.

Justification #5: The updated language clarifies that SSA will review both the annual costs and transaction fees each year and adjust them as needed prior to notifying the respondents of any changes. Previously, we only noted in this section that we would review and adjust the transaction fees. This updated language clarifies that we may also need to update the annual fee.

- **Change #6:** We updated the language to include payment of the annual fee under Costs of Services item number 5 on **page 15**. We revised the language as follows:

From:

If the recalculation of costs results in an increase or decrease in the transaction fee, the Requesting Party must sign and submit an amended Form SSA-1235 and may need to submit additional advance payments to continue receiving CBSV services.

To:

If the recalculation of costs results in an increase or decrease in the annual and transaction fee, the Requesting Party must sign and submit an amended Form SSA-1235 and may need to submit additional advance payments to continue

receiving CBSV services.

Justification #6: The updated language clarifies that the respondent will need to submit an amended Form SSA-1235 for increases or decreases of the annual fee or the transactional fees. Our previous language noted this requirement only for changes to the transactional fees; therefore, we are updating this language now to ensure we include the annual fee as well.

- **Change #7:** We updated the “Please Note” section under item number 3 of the Persons to Contact section on **page 24** to update the payment options for respondents. We revised the language as follows:

From:

Please Note: Advance payment (by company check or company credit card) is required.

Company checks must be mailed with a copy of the signed SSA-1235 (Agreement Covering Reimbursable Services) to the PO Box address listed in Section XVII(A)3 of the User Agreement.

To:

Please Note: Advance payment (by Pay.gov) is required.

Advance payment is required before work begins. Upon the receipt of the signed SSA-1235, we will create an eBill and an email will be sent from Pay.gov to you that the eBill is ready for payment.

Justification #7: We updated this language as we no longer accept paper checks from respondents, and we now require electronic payment through Pay.gov. In addition, we also revised the language to clarify that SSA requires advance payment before respondents can continue to use CBSV.

- **Change #8:** We updated the project manager contact information in item number 4 of the Persons to Contact section on **page 24**. We revised the language as follows:

From:

Reporting Lost, Compromised or Potentially Compromised PII
Office of Data Exchange, Policy Publications, and International Negotiations
Project Manager: Michael Wilkins 410-966-4965
Alternate Contact: Curtis Miller 410-966-2370

To:

Reporting Lost, Compromised or Potentially Compromised PII
Office of Data Exchange, Policy Publications, and International Negotiations
Project Manager: Peter Worstell 410-965-2967
Alternate Contact: Antoinette T Ford 410-966-4422

Justification #8: We updated this language to reflect current personnel.

- **Change #9:** We updated the executive authorizing signature and title on **pages 25 and 47.**

Justification #9: We updated this information to reflect current personnel.

We will implement these revisions upon OMB approval. These changes do not affect the public reporting burden.

We excluded these non-substantive changes in the prior OMB clearance submission approved in June 2023, since they occurred after OMB approval.