

**Justification for Non-Substantive Changes for Forms SS-5, SS-5-FS
Application for a Social Security Number (SSN) Card, the Social Security Number
Application Process (SSNAP), the Online Social Security Number Application Process
(oSSNAP) and the Internet SSN Replacement Card (iSSNRC) Application
20 CFR 422.103 - 422.110
OMB No. 0960-0066**

Background

Under 5 U.S.C. 552a(e)(3) of the *United States Code*, the Privacy Act provides that the agency must inform the individual it asks to supply information of the following: (1) the authority which authorizes the collection of information; (2) the principal purpose of the information; (3) the routine uses which may be made of the information; and (4) the effect of not providing the information.

The Privacy Act Statement attached to the SS-5 provides that Social Security Administration's (SSA) collection is authorized by sections 205 and 702 of the *Social Security Act (Act)* for the issuance of a new or replacement Social Security card. The statement authorizes the use of SS-5 data "to assist with administering income maintenance programs" and to "verify a person's eligibility for Federal benefit programs." Historically SSA has never used the parents' SSN in the enumeration process, as evidenced by how the agency's Numident does not include parents' SSN. Rather, the agency's collection of the parents' SSNs has been to act as a pass through to provide this information to the Internal Revenue Service (IRS) as required by section 205(c)(2) (H) of the *Act*.

In this change request, we are updating the Privacy Act Statement with an additional legal authority to allow SSA to use parents' SSNs, collected during the enumeration process, to develop leads for survivor benefits.

Revision to the Collection Instrument

- **Change #1:** We are revising the Privacy Act Statements on the Forms SS-5 and SS-5 FS and within the oSSNAP and iSSNRC applications.

Justification #1: We are revising the Privacy Act Statements to update the legal authorities to include Section 202 of the *Act*; how the agency will use the information; and the system of records in which the agency will store information. Specially, this will allow SSA to use parents' SSNs, collected during the enumeration process, to develop leads for survivor benefits.

We will implement these minor language changes to the Privacy Statements upon OMB's approval. These revisions will not affect the public reporting burdens for these information collections.