Justification for the Non-Substantive Changes for
Integrated Registration Services (IRES) System
20 CFR 401.45
OMB No. 0960-0626

Background

The Integrated Registration Services (IRES) system is an electronic authentication process by which the Social Security Administration (SSA) registers and authenticates users of our online business services. We collect the personal information one time only when the individual registers to use our online business services. Respondents are employers; employees; third party submitters of wage data; business entities providing taxpayer identification information; appointed representatives; representative payees; and data exchange partners conducting business in support of SSA programs.

We are making an update to IRES to enhance the digital identity authentication process needed to access business services. To ensure a more secure request, we will require users that need access to the Internet Representative Payee Accounting (iRPA) application for organizations to authenticate through our Public Credentialing and Authentication Process (OMB Clearance No. 0960-0789), known as eAccess; which utilizes Login.gov and ID.me for credentialing. The other applications behind IRES will continue to follow the current authentication process, until a later release when we migrate more applications to eAccess.

We will implement this new, non-substantive revision on August 17, 2024**.** Therefore, we are asking for OMB's approval of these revision as soon as possible, to ensure we can implement on time.

Revisions to the Collection Instrument

- **Change #1:** SSA will require users that need access to the Internet Representative Payee Accounting (iRPA) application for organizations to authenticate through our Public Credentialing and Authentication Process (OMB Clearance No. 0960-0789), known as eAccess; which utilizes Login.gov and ID.me for credentialing.

    Justification #1: This change is to provide the proper authentication means for customers based on which business services they need to access. In addition, it increases the security for the users who access iRPA.

Estimates of Public Reporting Burden

We are adjusting the reporting burden to this information collection because customers using the iRPA application will no longer register through IRES. We are also adjusting the number of respondents and burden hours we reported in our existing burden estimate to match the current management information (MI) data which shows a decrease likely due to previous removals of other applications from IRES. OMB approved the current burden estimate on 3/29/2023, and,

while we updated our estimates then in light of other application removals from behind IRES, our MI data shows a further decrease which we are reporting now.

* Per our MI data, the total number of active users of iRPA is 5,825. We are only removing this amount from the number of respondents. In addition, we are adding these 5,825 respondents to the number of respondents for the eAccess package (OMB No. 0960-0789). If needed, we will adjust the burden information once we collect more MI data after the release (as we note that those who register to use eAccess may not return to use the IRES authentication).

Modality of Completion	Number of Respondents	Frequency of Response	Average Burden Per Response (minutes)	Estimated Total Annual Burden (hours)	Average Theoretical Hourly Cost Amount (dollars)*	Total Annual Opportunity Cost (dollars) **
IRES Internet Registrations	207,262	1	5	17,272	$31.48**	$543,723*
IRES Internet Requestors	12,123,656	1	2	404,122	$31.48**	$12,721,761*
IRES CS (CSA) Registrations	2,216	1	11	406	$31.48**	$12,781*
Totals:	**12,333,134**			**421,800**		**$13,278,265***
Removal of iRPA Users (from IRES Internet Registrations)*	-5,825	1	5	-485	$31.48**	-$15,268*
Removal of iRPA Users (from IRES Internet Requestors)*	-5,825	1	2	-194	$31.48**	-$6,107*
New Totals:	**12,321,484**			**421,120**		**$13,256,890***

** We based this figure on average U.S. citizen's hourly salary, as reported by Bureau of Labor Statistics data (https://www.bls.gov/oes/current/oes_stru.htm).

*** 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.**

We base our burden estimates on current management information data, which includes data from actual interviews, as well as from years of conducting this information collection. Per our management information data, we believe that **2, 5,** or **11** minutes accurately shows the average burden per response for learning about the program; receiving notices as needed; reading and understanding instructions; gathering the data and documents needed; answering the questions and completing the information collection instrument; scheduling any necessary appointment or required phone call; consulting with any third parties (as needed); and waiting to speak with SSA employees (as needed). Based on our current management information data, the current burden information we provided is accurate. The total burden for this ICR is **421,120** burden hours (reflecting SSA management information data), which results in an associated theoretical (not actual) opportunity cost financial burden of **$13,256,890**. SSA does not charge respondents to complete our applications.

<u>Future Plans</u>
Due to the agile nature of our projects, we expect to eventually move applications from IRES to the eAccess platform. At this time, we are still finalizing our IT modernization plans for these changes. We expect to submit another change request within six to nine months to request approval for additional updates to the system, and potentially, update the burden to include the removal of more users if we are able to move applications to a new platform.