

**Addendum to Supporting Statement for Integrated Registration Services (IRES) System**  
**20 CFR 401.45**  
**OMB No. 0960-0626**

**Public Comments on the Information Collection**

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

The 60-day Comment Period began on November 6, 2024, and ended on January 6, 2025, at 11:59pm. We received a total of 1 public comment from the National Organization of Social Security Claimants' Representatives (NOSSCR) on the 60-day comment period FRN. We published the 30-day Comment Period Notice on January 8, 2025, and received the same public comment from NOSSCR on the published Notice.

The following contains a summary of NOSSCR's comments and SSA's responses:

- **Public Comment #1:**

NOSSCR encourages SSA to strongly consider ways to enhance the security of the BSO and related Electronic Records Express (ERE) logins, both of which are operated on IRES. The current ERE login system lacks the needed security to properly protect claimant data. Protecting claimant data is of the utmost importance, and as representatives we stand ready to work with the agency to integrate the most secure login procedures into our practices.

**SSA Response #1:**

SSA's long-term plan is to replace IRES with a phishing resistant multifactor authentication (MFA) federated credential from ID.me and/or Login.gov for appointed representatives. We are working on making this update.

- **Public Comment #2:**

NOSSCR notes that under the current BSO login setup, the individual representative is the only person who technically has login access to the represented claimant's file. They note that this is impractical. To limit file access solely to the individual representative necessarily prevents timely file workup. NOSSCR strongly encourages the agency to enhance the electronic login system to allow a representative's verified staff member to access claimant files utilizing their own secured logins.

**SSA Response #2:**

SSA is considering access to some portals by the appointed representatives' staff.