

**Addendum to the Supporting Statement for eSubmit
OMB No. 0960-NEW**

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Background

From March 17, 2020, through April 7, 2022, because of the Coronavirus (COVID-19) public health emergency, SSA encouraged the public to use our online and automated telephone services while we offered limited in-person services in field offices. During this time, we noticed the burden on the public for the significant number of forms and paperwork we need to receive from respondents to process their applications. While we were able to complete forms with the public through our personal interview process via telephone or video conference, we still needed to request the submission of evidence and some paper forms for which we have no other process. The need to submit these forms to SSA via mail poses a significant burden on the members of the public doing business with us. In addition, the increased volume of documents sent to our field offices overwhelmed SSA, who had limited staff on site to process the mail at that time. We estimate that our field offices receive roughly 55 million pieces of mail each year, which equates to the agency spending 2,196 work years opening and scanning mail. As it takes time away from working with the public for employees to open and scan each paper mail submission from the public, limiting the time the field office staff have to review and process those submissions or work directly with the public, SSA needs a way to lessen the burden on the public, as well as on the front-line employees and managers; allow staff more time to work with the public and process the information we receive; and modernize form submission and document intake. Therefore, we are creating a new service called Upload Documents (eSubmit).

In addition, Executive Order (EO) 14058, Transforming Federal Customer Experience and Service Delivery to Rebuild Trust in Government, requires SSA to develop a mobile-accessible, online process so that any individual applying for or receiving services from SSA can upload forms, documentation, evidence, or correspondence associated with their transaction without the

need for service-specific tools or traveling to a field office. To comply with EO 14058, SSA created Upload Documents (eSubmit), which will allow respondents to upload and submit forms, documentation, and evidence to SSA electronically through the Internet or a mobile application.

Finally, Upload Documents (eSubmit) aligns with SSA’s Agency Strategic Plan (ASP) Goal to deliver services effectively and improve service delivery. The ASP recommends a strategy of “increasing the use of online services.” By redirecting individuals from mailing paper documents to our offices, to using an electronic upload tool like Upload Documents (eSubmit), the agency both expands the electronic service delivery channels available to individuals and encourages the use of online services, saving valuable employee time which staff can then use to help the public.

List of Forms For Which We Included Both the Public Reporting Burden and Cost to the Federal Government Under Their Individual OMB Control Numbers

As stated in the Supporting Statement, respondents will use Upload Documents (eSubmit) to submit the following forms; however, as we already capture both the public reporting burden data and the cost to the Federal government for these forms under their respective OMB Control Numbers, we do not include that information under the Upload Documents (eSubmit) Information Collection Request.

The following is a list of those forms we will accept through Upload Documents (eSubmit) that are OMB approved separately:

Release one:

OMB Number	Form Number	Title
0960-0144	SSA-3441	Disability Report – Appeal
0960-0269	HA-501	Request for Hearing by Administrative Law Judge
0960-0277	HA-520	Request for Review of Hearing Decision
0960-0289	HA-4632	Claimant’s Medications
0960-0292	HA-4631	Recent Medical Treatment
0960-0300	HA-4633	Claimant’s Work Background
0960-0578	SSA-3369	Work History Report
0960-0579	SSA-3368	Adult Disability Report
0960-0622	SSA-561	Request for Reconsideration
0960-0681	SSA-3373	Adult Function Report

Release two:

OMB Number	Form Number	Title
0960-0001	SSA-760	Certification of Support
0960-0009	SSA-3	Marriage Certification
0960-0013	SSA-8	Application for Lump Sum Death Payment

0960-0015	SSA-521	Request for Withdrawal of Application
0960-0025	SSA-7104	Partnership Questionnaire
0960-0037	SSA-632	Request for Waiver of Overpayment Recovery
0960-0037	SSA-634	Request for Change in Overpayment Recovery Rate
0960-0038	SSA-754	Statement of Marital Relationship
0960-0045	SSA-795	Statement of Claimant or Other Person
0960-0046	SSA-766	Statement for Self-Employment Income
0960-0061	SSA-7156	Farm Self-Employment Questionnaire
0960-0064	SSA-7157-F4	Farm Arrangement Questionnaire
0960-0120	SSA-2512	Military Service Federal Benefit Questionnaire
0960-0160	SSA-3885	Government Pension Questionnaire
0960-0189	SSA-2935 SSA-8552	Authorization to the SSA to Obtain Personal Information Interview Confirmation
0960-0229	SSA-8000	Application for Supplemental Security Income (SSI)
0960-0247	SSA-546	Worker's Compensation Public Disability Benefit Questionnaire
0960-0347	SSA-765	Response to Notice of Revised Determination
0960-0348	SSA-769-U4	Request for Change in Time/Place of Disability Hearing
0960-0349	SSA-789-U4	Request for Reconsideration - Disability Cessation - Right to Appear
0960-0395	SSA-150	Modified Benefit Formula Questionnaire
0960-0398	SSA-25	Certificate of Election for Reduced Spouse's Benefits
0960-0444	SSA-8001	Application for Supplemental Security Income (SSI) (Deferred or Abbreviated Application)
0960-0448	SSA-2490-BK	Application for Benefits Under a U.S. International Social Security Agreement
0960-0460	SSA-4178	Marital Relationship Questionnaire
0960-0461	SSA-2574	Information About Joint Checking/Savings Account
0960-0474	SSA-4162	Childcare Dropout Questionnaire
0960-0481	SSA-2855	Statement of Funds You Provided to Another, Statement of Funds You Received
0960-0525	SSA-7050-F4	The Request for Social Security Earnings Information
0960-0529	SSA-5062	Claimant's Statement About Loan of Food or Shelter, Statement About Food or Shelter Provided to Another
0960-0534	SSA-773-U4	Waiver of Right to Appear, Disability Hearing
0960-0618	SSA-1 SSA-2	Application of Retirement Insurance Benefits Application of Wife's or Husband's Insurance Benefits
0960-0759	SSA-4111	Certificate of Election for Reduced Widow(er)'s and Surviving Divorced Spouse's Benefits
0960-0776	SSA-640	Financial Disclosure for Civil Monetary Penalty (CMP) Debt
0960-0784	SSA-44	Medicare Income-Related Monthly Adjustment Amount-Life Changing Event
0960-0801	SSA-8510	Authorization for the Social Security Administration to Obtain Personal Information

Public Comments on the Information Collection

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

The 60-day Comment Period FRN published on March 1, 2023, at 88 FR 13004. The comment period began on March 1, 2023, and ended on May 1, 2023, at 11:59pm. We received a total of 1 public comment from a single public entity on the 60-day comment period FRN and posted that public comment on Upload Documents (eSubmit). The following contains a summary of the comments within the overall public comment we received as well as SSA's responses:

- **Comment #1:** The commenter urges SSA to prioritize incorporating user experience research, language accessibility, and access by an authorized representative throughout the eSubmit introduction and implementation process, and to ensure that existing "low tech" means of access remain available to those who cannot or prefer not to engage with SSA electronically.

SSA Response: SSA conducted rigorous user experience design testing with a diverse audience of capabilities and prior experience. Further, we tested the designs to meet Section 508 compliance. Regarding appointed representatives use of Upload Documents (eSubmit), SSA's initial implementation will only be offered to individuals submitting forms on their own behalf. We will explore expansion of Upload Documents (eSubmit) to third parties and authorized representatives submitting on behalf of individuals at a later point. In the meantime, SSA will continue to maintain all existing service delivery options for respondents, including "low tech" means to access our forms and submit them to SSA.

- **Comment #2:** The commenter notes that SSA's existing process of seeking additional information from SSI applicants is cumbersome and can be inefficient: sending a hard-copy letter via the postal service, which applicants must answer by return mail or an in-person office visit, is time consuming, burdensome, and expensive. While the positive impacts of this move towards modernization are plain, the commenter is concerned with technological access and usability for all of SSA's respondents. They note that the COVID-19 public health emergency also highlighted a stark generational divide in technology access, as older adults struggled to navigate the very technology that was suddenly critical to survival. This technologically underserved population are the people most likely to need to use the eSubmit system. The commenter requests that SSA take this population into account when developing and implementing this new system.

SSA Response: SSA conducted rigorous user experience design testing with a diverse audience of capabilities and prior experience, including older adults. Further, we tested the designs to meet Section 508 compliance, and also tested the screens for ease of use. In addition, as mentioned above, we will continue to offer other means for the public to submit information to SSA for those who struggle to use the new system.

- **Comment #3:** The commenter suggests SSA works to ensure a usable and accessible system by taking the following steps to allow eSubmit to succeed broadly and avoid

deepening the digital divide: (1) develop an accessible interface, including through the incorporation of user experience research; (2) provide multilingual options for eSubmit, including, but not limited to, a Spanish language version; and (3) allow for access by authorized representatives of beneficiaries and applicants. They further suggest incorporating customizable text; colors with good contrast; large links, buttons, and controls; understandable content; and clear notifications and feedback.

SSA Response: SSA thanks the commenter for this input. In response to each step outlined above, we offer the following responses:

- (1) As mentioned above, SSA conducted rigorous user experience design testing with a diverse audience of capabilities and prior experience, and we tested the designs to meet Section 508 compliance.
 - (2) Regarding multilingual options, SSA's initial implementation of Upload Documents (eSubmit) will only be in English; however, we will explore alternative language and LEP options at a later point.
 - (3) Regarding appointed representatives use of Upload Documents (eSubmit), for the initial implementation, we will only offer use of the system to individuals submitting forms on their own behalf. We will explore expansion to third parties and authorized representatives submitting on behalf of individuals at a later point.
 - (4) In terms of the commenter's further suggestion for user customization, we are not currently considering this option; however, if we may consider them in the future, if those user customization options meet Section 508 compliance.
- **Comment #4:** The commenter reiterated that SSA serves an increasingly diverse customer base which calls for policies and practices tailored to address diverse language needs. They also note that a large number of SSA respondents have limited English proficiency. The commenter encourages SSA to do more with its online portals (including ePFT, the iClaim, and iAppeals), which are currently only available in English. They would like to see SSA create a multilingual content for eSubmit and other SSA portals consistent with the guidelines provided at LEP.gov.

SSA Response: As mentioned above regarding diverse language needs, SSA's initial implementation of Upload Documents (eSubmit) will only be in English. However, we will explore alternative language and LEP options at a later point.

- **Comment #5:** The commenter also revisited their suggestion that SSA open eSubmit for use by representative payees on behalf of their beneficiary or applicant for whom they work. They note the fraud component and suggest that SSA allow for these representatives to have access to authentication, as well, so they can use eSubmit on behalf of the claimants they represent.

SSA Response: As we mentioned previously, for SSA's initial implementation, we will only offer the use of Upload Documents (eSubmit) to individuals submitting forms on their own behalf. However, we plan to explore the expansion to representative payees submitting on behalf of people they represent at a later point.

- **Comment #6:** The commenter notes that adjusting to a new web-based system may prove difficult for older respondents, and those who experience homelessness. They suggest that this adjustment could cause anxiety and concern for these respondents; therefore, the commenter recommends that SSA retain in person appointments, the use of the US postal service to submit documents, and all other currently existing methods of doing business with SSA, and ensure these methods remain robust for those respondents who prefer them.

SSA Response: SSA will continue to maintain all existing service delivery options.

b. 30-Day Comment Period Federal Register Notice (FRN):

The 30-day Comment Period FRN published on May 18, 2023, at 88 FR 31838. The comment period began on May 18, 2023, and will end on June 20, 2023, at 11:59pm. We will review and respond to any public comments we receive during the 30-day comment period FRN. If we receive any comments in response to this Notice, we will forward them to OMB.

Round 1 Usability Testing/Evaluation Held from 10/26/22 – 10/28/22:

SSA conducted usability testing on Upload Documents (eSubmit) with the intended goal to have users evaluate the design for comprehension, prioritization of information, and to uncover opportunities for improvement based on the information collected. Additionally, SSA collected the time on task to ensure we had management information data on the time burden on the public for this new information collection.

We conducted nine moderated usability tests with public users on an Upload Documents (eSubmit) prototype that included a series of tasks within a scenario. These members of the public varied in age, race, birth gender, birth identity, ethnicity, and education. Approximately 88% of these users completed the testing with Upload Documents (eSubmit) on a laptop or desktop computer. All of these users stated that Upload Documents (eSubmit) was easy to use and felt confident in providing the SSA technician with consent to receive an email from SSA with the link to Upload Documents (eSubmit). Most users expected a way to access Upload Documents (eSubmit) through our www.ssa.gov website or through their mySSA accounts and were surprised that this was not the case.

Our usability testing also showed that some users had difficulty finding and accessing the link from the email. In addition, most users expected more information in the email on what they would need to submit to SSA through Upload Documents (eSubmit), including specific information about the requests and dates.

Findings:

- While the Sign In page is out of scope, users expressed that they felt comfortable to proceed using existing credentials or by creating a new account.
- Several users expected to see examples of types of evidence that are acceptable and are specific to the request.

- A couple users read the information notice but did not reference the paper notice during the evaluation.
- Some users struggled with navigating from the PDF tab back to the dashboard.
- If users needed an extension on their requests, they would contact SSA.

Recommendations

- Include SSA branding and contact information in the email to bolster trustworthiness and communication.
- Include a way to access Upload Documents (eSubmit) on ssa.gov and in mySSA.
- Include leading information and enhance the action (Upload Documents (eSubmit) link) in the email.
- Add more details in the email, including specific information about the requests and dates.
- Format email as HTML to support enhancements.
- Provide examples of acceptable and non-acceptable evidence under instructions so that users can differentiate requests.
- Add more detailed instructions about the PDF link.
- Provide instructions on how to request a deadline extension.
- Usability test a force download option for the PDF form.

Note: We provide more information on our usability testing in the following document:



eSubmit UXG
Usability Testing Fin

Round 2 Usability Testing/Evaluation Held from 4/24/23 – 5/5/23:

SSA conducted the second round of usability testing on Upload Documents (eSubmit) with the intended goal to have users evaluate the most recent design with an emphasis on ease of navigation and the user's ability to upload and sign documents.

We conducted fifteen moderated usability tests with public users on an Upload Documents (eSubmit) prototype that included a series of tasks within a scenario. These members of the public varied in age, race, birth gender, birth identity, ethnicity, and education. All participants completed the testing with Upload Documents (eSubmit) on a laptop or desktop computer.

Our usability testing showed that most users experienced difficulty with PDFs opening in a new browser tab. Additionally, most users reported issues with the upload process, specifically, they did not understand how to save a PDF and return to the upload page to upload it.

The UXG team evaluated three slightly different designs (designs A, B, and C) of the initial upload page. As discussed in the below findings, one design clearly performed better, design C.

Findings:

- Regarding PDF opening in a new browser tab, with designs A and B the following issues were observed:
 - Most users expected when they opened the PDF it was an online form they were submitting.
 - Most users looked for a submit and/or save button at the bottom of the PDF form.
 - Most users could not figure out how to save the PDF document.
 - Most users were not confident navigating browser tabs in general and had issues returning to the upload page.
 - Some users assumed the PDF form saved automatically.
 - Some users were not familiar with using browser tabs.
 - The above issues decreased with design C.
- Regarding the upload process, with designs A and B the following issues were observed:
 - Most users did not understand how to save the PDF and return to the upload page to then upload.
 - Most users were confused about where they were in the process when the PDF opened in a new tab.
 - Most users did not read the instructions.
 - Most users clicked on the PDF link before reading the remaining instructions.
 - Most users did not understand the steps involved with uploading documents.
 - Some users potentially did not see/read 'choose files' text in the file input component.
 - The above issues decreased with design C.

Recommendations

- Update Upload Documents (eSubmit) screen design to incorporate design C, which includes layout updates, visual updates to the upload component, updated labels, the inclusion of step numbers and language updates to the instruction text.

Note: We provide more information on our usability testing in the following document:



eSubmit P12
Usability Testing Hiç