Supporting Statement for
The enhanced Leads and Appointment System (eLAS)
and Internet Appointments (iAppointment)
20 CFR 404.630, 20 CFR 416.345
OMB No. 0960-0822

A.   Justification

1. Introduction/Authoring Laws and Regulations

The Social Security Administration (SSA) uses the date we receive an individual's intent to file for Social Security Benefits, Medicare Part A (Health Insurance) or Supplemental Security Income as the application filing date provided the individual files an application within a prescribed period as defined in Sections *20 CFR 404.630 and 20 CFR 416.340-416.345* of the *Code of Federal Regulations*. We refer to the date we receive the intent to file as the protective filing date.

SSA technicians use the enhanced Leads and Appointment System (eLAS) and the Internet Appointment (iAppointment) System to document the protective filing date. SSA uses eLAS to document an individual's intent to file for benefits or a third-party's intent to file for benefits on behalf of an applicant they represent and schedule an appointment with the servicing field office of their choice. iAppointment is an online process that allows members of the public an easy-to-use method to schedule an appointment with the servicing office of their choice, which then interacts with the eLAS system tools.

2. Description of Collection

SSA uses data collected by eLAS and iAppointment to document a protective filing date, issue notices to confirm an appointment date to file for benefits and provide time periods for filing, and to issue notices to individuals to whom we explained SSI payments, but they indicated no desire to file an application.

Individuals or third-party representatives who contact SSA by phone or in-office about filing for benefits for themselves or someone else and who are unable to file the same day are provided the opportunity to file online or to schedule an appointment to file with an SSA representative. SSA employees collect information from these individuals and record their information in eLAS. Applicants and third-party representatives who attempt to complete an application online are provided the opportunity to use iAppointment to schedule an appointment to file for benefits with an SSA employee. Appointments made using iAppointment will propagate into eLAS.

Enhanced Leads and Appointment System (eLAS):
For an individual who contacts SSA via phone or in office regarding filing for benefits, SSA explains their filing options. eLAS is a non-public facing system that allows SSA employees in the field offices, workload support units, and teleservice centers to schedule appointments and document an individual's intent to file using specific script that presents the same questions to each individual (e.g., name, contact

information, benefits wanting to file, etc.). If the individual requests an in office, telephone, or video interview with an SSA employee, the technician schedules an appointment with the individual for a specific time and date. If an individual states that they intend to walk into their local field office, file online, or requests to complete a paper application, the technician documents the individual's intent to file to prevent a loss of benefits. The date the individual contacts SSA with an intent to file for benefits is referred to as the protective filing date. The SSA technician can use the protective filing date as the date of the application, provided the individual files an application within six months for Title II benefits, or within sixty days for Title XVI benefits. Once the technician schedules an appointment, the technician sends a confirmation notice that includes the appointment date, time, and location of the appointment if in person, as well as the date by which the individual must file the application to use the protective filing date as their application filing date.

In addition, once individuals begin receiving benefits, they may need to meet with an SSA technician regarding a post-entitlement event such as an overpayment, suspension of benefits, or a representative payee issue. SSA provides appointments for these post-entitlement events.

At the time a technician interviews the individual to take a benefit application, eLAS interfaces with the web-based claims system to propagate the protective filing date into the claim's system along with other contact information the individual had previously provided.

Internet Appointment (iAppointment) System:
iAppointment is an online process that allows members of the public an easy-to-use method to schedule an appointment with the servicing office of their choice. Since the application date can affect when a claimant's benefit begins, iAppointment records a protective filing date, offers an appointment, and provides respondents information related to the date by which they must file their application.

SSA offers iAppointment to individuals who either (1) attempt to establish an iClaim application but are unable to because they failed the initial verification checks, or (2) start iClaim but state their language preference is other than English. Individuals entering iClaim and selecting "apply for Benefits" are directed to *my*Social Security to provide their basic information (i.e., name, SSN, and date of birth) to match it to our records and authenticate their identity. If their information does not match, we provide an alert to verify the information and try again. After the third attempt, the system evaluates the information and if the only issue is the name spelling (e.g., Brian vs. Bryan), individuals are allowed to continue and start a benefit application. Otherwise, the system provides a message that the information provided does not match our records, and offer two options: (1) schedule an appointment using iAppointment, or (2) call SSA at our toll-free number. Individuals entering iClaim and successfully passing authentication are allowed to continue in iClaim and provide us additional contact information, which includes language preference. If they chose any language other than English, we also provide the message with the option to schedule an appointment online or proceed filing the claim in English.

The iAppointment system propagates information the responder already entered in iClaim. However, applicants must also provide minimal contact information such as mailing address; telephone number; email address, language preference; type of appointment (Disability, Retirement, Medicare); and whether they prefer a telephone or in-office appointment to be able to schedule the online appointment.

If the available appointment times do not meet the customer's needs, iAppointment allows them to enter a different zip code to identify another field office, which may offer different appointment times. At this time, SSA only offers the option for iAppointment to first party applicants with a domestic address. All others receive a message directing them to call the National 800 Number for assistance. If a foreign applicant is unable to complete iClaim, iAppointment directs them to contact a Social Security representative, and provides a link to SSA's Service Around the World website.

There are no psychological costs associated as eLAS and iAppoinment asks individuals for basic information to process their requests.

The respondents are individuals and third-party helpers who request to schedule an appointment with an SSA field office.

3. **Use of Information Technology to Collect the Information**
One of the purposes of eLAS and iAppointment is to document the protective filing date. The vast majority of responders of this information collection are contacting SSA either via telephone or in a field office; in these cases, the SSA technician uses the web-based, Intranet eLAS to schedule the appointment and document the protective filing date. SSA uses iAppointment, by contrast, for specific users who are unable to complete an application via iClaim. Therefore, fewer than 1% of the respondents currently use iAppointment to request an appointment. iAppointment represents an available electronic submission option for those already using the iClaim Internet application to attempt to apply for benefits. While eLAS is an internal system, it is specifically used for individuals who have not sought out an electronic or digital means of submitting their application information.

4. **Why We Cannot Use Duplicate Information**
The information collected in eLAS and iAppointment is stored in one of SSA's databases so it can interact with the SSA's claim systems and be available when responders file a benefit application. Therefore, the information collected for the appointment is automatically transmitted into the claim's systems to avoid duplication of collection.

5. **Minimizing Burden on Small Respondents**
This collection does not significantly impact small businesses or other small entities.

6. **Consequence of Not Collecting Information or Collecting It Less Frequently**
If SSA did not have this information collection, we would be unable to document a protective filing date for Social Security benefits, Medicare Part A, or Supplemental Security Income (SSI). This would lead to a loss of benefits and be a direct violation

of the regulations established in the Code of Federal Regulations (*20 CFR 404.630 and 20 CFR 416.340-416.345* of the *Code of Federal Regulations*). There are no technical or legal obstacles that prevent burden reduction.

7. **Special Circumstances**
   There are no special circumstances that would cause SSA to conduct this information collection in a manner inconsistent with *5 CFR 1320.5*.

8. **Solicitation of Public Comment and Other Consultations with the Public**
   The 60-day advance Federal Register Notice published on April 23, 2024, at 89 FR 30428, and we received no public comments. The 30-day FRN published on July 5, 2024, at 89 FR 55666. If we receive any comments in response to this Notice, we will forward them to OMB.

9. **Payments or Gifts to Respondents**
   SSA provides no payments or gifts to the respondents (except for actual benefits payments if responders file for an application and qualify for them).

10. **Assurances of Confidentiality**
    The information we are requesting is protected and held confidential in accordance with *42 U.S.C. 1306*, *20 CFR 401* and *402, 5 U.S.C. 552* (Freedom of Information Act), *5 U.S.C. 552a* (Privacy Act of 1974), and OMB Circular No. A-130. Additionally, SSA protects the personal information it receives by adhering to our Internet Privacy Policy, which stipulates that:

    - The public does not need to give us personal information to visit our site;

    - We collect personally identifiable information only if we know beneficiaries or their representatives provided it;

    - We use personally identifying information to administer our programs and to provide certain online services;

    - We use web measurement and customization technologies to measure and analyze how our site is used and to customer user experience. We also use third-party vendors in our measurement and customization process;

    - We may share personal information with our employees and contractors, who have a need to know the information within their job duties, and outside the agency, as authorized by Federal law.

11. **Justification of Sensitive Questions**
    The information collection does not contain any questions of a sensitive nature.

12. **Estimates of Public Reporting Burden**

Modality of Completion	Number of Respondents	Frequency of Response	Average Burden Per Response (minutes)	Estimated Annual Burden (hours)	Average Theoretical Cost Amount (dollars)*	Average Combined Wait Time in Field Office or for Teleservice Center (minutes)**	Total Annual Opportunity Cost (dollars) ***
iAppointment	20,965	1	10	3,494	$31.48*		$109,991***
eLAS	7,270,161	1	10	1,211,694	$31.48*	21**	$118,246,750***
Totals	**7,291,126**			**1,215,188**			**$118,356,750***

* We based these figures on average U.S. worker's hourly wages (based on BLS.gov data, (https://www.bls.gov/oes/current/oes_nat.htm).

** We based this figure on the combined average FY 2024 wait times for field offices (approximately 24 minutes per respondent) and teleservice centers (approximately 17 minutes per respondent), based on SSA's current management information data.

*** 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**.

In addition, OMB's Office of Information and Regulatory Affairs (OIRA) is requiring SSA to use a rough estimate of a 30-minute, one-way, drive time in our calculations of the time burden for this collection. OIRA based their estimation on a spatial analysis of SSA's current field office locations and the location of the average population centers based on census tract information, which likely represents a 13.97 mile driving distance for one-way travel. We depict this on the chart below:

Total Number of Respondents Who Visit a Field Office	Frequency of Response	Average One-Way Travel Time to a Field Office (minutes)	Estimated Total Travel Time to a Field Office (hours)	Total Annual Opportunity Cost for Travel Time (dollars)****
1,366,732	1	30	683,366	$21,512,362****

****We based this dollar amount on the Average Theoretical Hourly Cost Amount in dollars shown on the burden chart above.

Per OIRA, we include this travel time burden estimate under the *5 CFR 1320.8(a)(4)*, which requires us to provide "time, effort, or financial resources expended by persons [for]…transmitting, or otherwise disclosing the information," as well as *5 CFR 1320.8(b)(3)(iii)* which requires us to estimate "the average burden collection…to the extent practicable." SSA notes that we do not obtain or maintain any data on travel times to a field office, nor do we have any data which shows that the average

respondent drives to a field office, rather than using any other mode of transport. SSA also acknowledges that respondents' mode of travel and, therefore, travel times vary widely dependent on region, mode of travel, and actual proximity to a field office.

NOTE: We included the total opportunity cost estimate from this chart in our calculations when showing the total time and opportunity cost estimates in the paragraph below.

We are not including Learning Cost because the information we are collecting from the public is common knowledge (e.g., contact information, choice of appointment type) which does not require any research or preparation. In addition, the respondent learns about the process when they call to make an appointment, or through the iClaim screens (for iAppointment). We estimate this learning cost is less than one minute per respondent.

The total burden for this collection instrument is **1,215,188** burden hours (reflecting SSA management information data), which results in an associated theoretical (not actual) opportunity cost financial burden of **$139,869,112**. SSA does not charge respondents to complete our applications.

13. **Annual Cost to the Respondents**
This collection does not impose a known cost burden on the respondents.

14. **Annual Cost to Federal Government**
The annual cost to the Federal Government is approximately **$59,829,919**. This estimate accounts for costs from the following areas:

Description of Cost Factor	Methodology for Estimating Cost	Cost in Dollars*
Designing and Printing the Form	Design Cost + Printing Cost	$0*
Distributing, Shipping, and Material Costs for the Form	Distribution + Shipping + Material Cost	$0*
SSA Employee (e.g., field office, 800 number, DDS staff) Information Collection and Processing Time	GS-9 employee x # of responses x processing time	$59,131,385
Full-Time Equivalent Costs	Out of pocket costs + Other expenses for providing this service	$0*
Systems Development, Updating, and Maintenance	GS-9 employee x man hours for development, updating, maintenance	$698,534
Quantifiable IT Costs	Any additional IT costs	$0*
Total		**$59,829,919**

* We have inserted a $0 amount for cost factors that do not apply to this collection.

SSA is unable to break down the costs to the Federal government further than we already have. First, since we work with almost every US citizen, it is difficult for us to break down the cost for processing a single form, as field office and State Disability Determination Services staff often help respondents fill out several forms at once, and the time it takes to do so can vary greatly per respondent. As well, because so many employees have a hand in each aspect of our forms, we use an estimated average hourly wage, based on the wage of our average field office employee (GS-9) for these calculations. However, we have calculated these costs as accurately as possible based on the information we collect for creating, updating, and maintaining these information collections.

15. **Program Changes or Adjustments to the Information Collection Request**
    When we last cleared this IC in 2021, the burden was 983,892. However, we are currently reporting a burden of 1,215,188 hours. This change stems from an increased number of responses from 5,903,352 to **7,**291,126. There is no change to the burden time per response. Although the number of responses changes, SSA did not take any actions to cause this change. These figures represent current Management Information.

    * Note: The total burden reflected in ROCIS is **5,987,321**, while the burden cited in #12 of the Supporting Statement is **1,215,188**. This discrepancy is because the ROCIS burden reflects the following components: field office waiting time + a rough estimate of a 30-minute, one-way. In contrast, the chart in #12 of the Supporting Statement reflects actual burden.

16. **Plans for Publication Information Collection Results**
    SSA will not publish the results of the information collection.

17. **Displaying the OMB Approval Expiration Date**
    SSA is not requesting an exception to the requirement to display the OMB approval expiration date.

18. **Exceptions to Certification Statement**
    SSA is not requesting an exception to the certification requirements at *5 CFR 1320.9* and related provisions at *5 CFR 1320.8(b)(3)*.

B.   **Collection of Information Employing Statistical Methodologies**
      This information collection does not use statistical methods.