Supporting Statement for Application Status 20 CFR 401.45 OMB No. 0960-0763

A. Justification

1. Introduction/Authoring Laws and Regulations

Section 5 *U.S.C.* 552A (*e*)(10) of the *United States Code* (*U.S. Code*) requires Federal agencies to establish appropriate administrative, technical, and physical safeguards to ensure the security and confidentiality of records. In addition, in the same sub-section, 5 *U.S.C.* 552A (*f*)(2)&(3) requires agencies to establish requirements for identifying an individual who requests a record or information pertaining to that individual, and to establish procedures for disclosure of personal information. The Social Security Administration (SSA) collects this information under the authority of the *Privacy Act* of 1974 at 5 *U.S.C.* 552A (*e*)(10) of the *U.S.Code*. SSA promulgated *Privacy Act* rules for verifying identity in 20 *CFR* 401.45 of the *Code of Federal Regulations*. We also established the authority to collect this information in section 205(*a*) of the *Social Security Act*.

2. Description of Collection

When Social Security claimants submit a claim with SSA online or in a field office an SSA claims specialist informs them they can check the status of their application by calling SSA to use our Automated Telephone application or speak with a representative, or they can check the status of their claim using their *my* Social Security account. Application Status provides users with the capability to check the status of their pending Social Security claims via the National 800 Number Automated Telephone Service. Users need their Social Security number and a confirmation number to access this information. SSA's systems determine the type of claim(s) the caller filed based upon the information they provide. Subsequently, the automated telephone system provides callers with the option to choose the claim for which they wish to obtain status. If the caller applied for multiple claims, the automated system allows the caller to select only one claim at a time. Once callers select the claim(s) they are calling about, an automated voice advises them of the status of their claim. The respondents are current Social Security claimants who wish to check on the status of their claims.

3. Use of Information Technology to Collect the Information

In accordance with the agency's Government Paperwork Elimination Act plan, SSA created an Automated Telephone application. Based on our data, we estimate approximately 100% of respondents under this OMB number use the automated version. In addition to the Automated Telephone Application Status, respondents can choose to check the status of their claim online through their *my* Social Security account (OMB No. 0960-0789).

4. Why We Cannot Use Duplicate Information

SSA previously collected, or provided the information we collect through the Automated Telephone application, and posted it to SSA's master electronic records; however, we ask for it again for comparison and authentication purposes. There currently is no existing alternative means for SSA to authenticate respondents' identity using our Automated Telephone application other than requesting they provide the information when the request is user-initiated over the telephone. In addition, as we mentioned above, respondents can authenticate through our SSA's Public Credentialing and Authentication Process (OMB No. 0960-0789), and check the status of a claim through their *my* Social Security account. As we cover the OMB approval for the authentication to use the Internet *my* Social Security account under a separate OMB number, we do not include that burden information here.

5. Minimizing Burden on Small Respondents

This collection does not affect small businesses or other small entities.

6. Consequence of Not Collecting Information or Collecting it Less Frequently

If we were unable to authenticate the respondent's information, we would not be able to respond to these requests. Because we only collect the information on an as needed basis, we cannot collect it less frequently. There are no technical or legal obstacles to burden reduction.

7. Special Circumstances

There are no special circumstances that would cause SSA to conduct this information 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 July 25, 2022, at 87 FR 44182, and we received no public comments. The 30-day FRN published on October 6. 2022, at 87 FR 60721. If we receive any comments in response to this Notice, we will forward them to OMB.

9. Payment or Gifts to Respondents

SSA does not provide payments or gifts to the respondents.

10. Assurances of Confidentiality

SSA protects and holds confidential the information it collects 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.

11. Justification for 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 Total Annual Burden Hours	Average Theoretical Hourly Cost (dollars)*	Average Wait for Teleservice Centers (minutes) **	Total Annual Opportunity Cost (dollars)***
				(hours)			
Application	790,821	1	3	39,541	\$19.86*	19**	\$5,758,764***
Status							

^{*} We based this figure by averaging both the average DI payments based on SSA's current FY 2022 data (https://www.ssa.gov/legislation/2022factsheet.pdf), and the average U.S. worker's hourly wages, as reported by Bureau of Labor Statistics data (https://www.bls.gov/oes/current/oes nat.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.

The total burden for this ICR is **39,541** burden hours (reflecting SSA management information data). We based these figures on the data we obtained from the Cisco Voice Portal system. We estimated the figures using a multi-year period. The figures change each year based on the number of respondents who attempt to access or start the application. The burden hours noted above result in an associated theoretical (not actual) opportunity cost financial burden of **\$294,580**. SSA does not charge respondents to complete our applications.

13. Annual Cost to the Respondents (Other)

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 **\$1,391,724**. This estimate accounts for costs from the following areas:

Description of Cost	Methodology for Estimating	Cost in Dollars*
Factor	Cost	
Designing and Printing	Design Cost + Printing Cost	0*
the Form		
Distributing, Shipping,	Distribution + Shipping +	0*
and Material Costs for the	Material Cost	

^{**} We based this figure by averaging the average FY 2022 wait times for teleservice centers, based on SSA's current management information data.

Form		
SSA Employee (e.g., field	GS-9 employee x # of	0*
office, 800 number, DDS	responses x processing time	
staff) Information		
Collection and Processing		
Time		
Full-Time Equivalent	Out of pocket costs + Other	0*
Costs	expenses for providing this	
	service	
Systems Development,	GS-9 employee x man hours	\$1,368,000
Updating, and	for development, updating,	
Maintenance	maintenance	
Quantifiable IT Costs	Any additional IT costs	0*
Other	Vendor cost per automated	\$23,724
	call	
Total		\$1,391,724

^{*} 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. 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 2019, the burden was 12,424 hours. However, we are currently reporting a burden of 39,541 hours. This change stems from an increase in the number of responses from 248,485 to 790,821, which we believe is due to our removing the requirement for callers to provide their claim confirmation number, which resulted in more people choosing to use the Automated Telephone System application (over speaking directly to an SSA staff member). There is no change to the burden time per response. SSA did not take any other actions to cause this change. These figures represent current Management Information data.

* **Note**: The total burden reflected in ROCIS is **289,968**, while the burden cited in #12 of the Supporting Statement is **39,541**. This discrepancy is because the ROCIS burden reflects the telephone waiting time. 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 for the Automated Telephone Application.

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 Methods

SSA does not use statistical methods for this information collection.