

Supporting Statement for eSignature/Upload Documents
20 CFR 404.704; 404.1512, 416.200, 416.912, and 422.505
OMB No. 0960-0830

A. Justification

1. Introduction/Authoring Laws and Regulations

In the digital age, individuals expect to complete transactions online, including submitting documents and forms to government agencies. The agency offers several service-specific options for individuals to submit forms and other documents online (e.g., iClaims, OMB #0960-0618; iAppeals, OMB Number 0960-0269 & 0960-0622; Electronic Records Express, OMB #0960-0753; etc.). While these available options are useful, the agency uses eSignature/Upload Documents [formerly Upload Documents (eSubmit)] to expand the options for first-party individuals to securely submit information electronically to SSA to complete business with the agency and support claims for benefits. The Social Security Administration (SSA) introduced eSignature/Upload Documents nationally in April 2024, as a new way for individuals to securely submit evidence and forms electronically to SSA.

SSA relies heavily on receiving physical forms, proofs, and evidence from customers and third parties (e.g., appointed representatives) either in office or via paper mail. SSA estimates that our offices receive roughly 35-36 million pieces of mail each year and that it takes about 4 minutes per paper mail parcel for front line staff to manually open, sort, review, digitize, and assign each piece of mail manually using our backend intake processing systems. This takes SSA technicians significant time that could be spent on other critical public service workloads, and results in slow processing for customers who expect SSA to pay the right amount, to the right person, at the right time.

SSA regulations set out requirements for the evidence and forms respondents need to submit and complete to conduct business with the agency. As per the following sections of the *Code of Federal Regulations*, including, but not limited to 20 CFR 404.704, 404.1512, 416.200, 416.912, and 422.505, we request evidence and information from the public. 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 travel to a field office. To comply with *EO 14058*, SSA created eSignature/Upload Documents, which allows respondents to upload and submit forms, documentation, and evidence to SSA electronically through the Internet or a mobile application. Note that some regulations (such as 20 CFR 404.707), and policies require an individual to submit original evidence for eligibility or entitlement purposes; SSA does not accept submissions through eSignature/Upload Documents for those types of documents.

Finally, eSignature/Upload Documents aligns with SSA's Agency Strategic Plan (ASP)

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 eSignature/Upload Documents, the agency both expands the electronic service delivery channels available to individuals and encourages the use of online services, saving time for the respondents, as well as valuable employee time which staff can then use to help the public in other ways.

2. Description of Collection

As per the requirements of *EO 14058*, respondents may use the secure upload portal, eSignature/Upload Documents, to submit documents and webforms to SSA. As of the March 2024 national rollout, eSignature/Upload Documents contains 71 forms and allows for the electronic submission of 79 evidence types. The current process requires an SSA technician to request forms and evidence from a customer, where an email or text is sent to the customer with a link to upload these documents. As a direct result of SSA Customer Experience (CX) testing and feedback recommendations, the eSignature/Upload Documents team is enhancing the tool to include an expansion of forms and evidence types available for upload including additional PDFs, as well as static and dynamic webforms. While adding additional PDFs and static webforms increases the forms and evidence available for customers to upload electronically, the dynamic webforms modernize the forms for easier customer completion and submission. Dynamic webforms adapt questions based on the customer’s response, ask questions in plain language, and are formatted in an easily understood way. Upon customer completion of a dynamic webform, the respondent submits the form to SSA electronically and the system generates a printable PDF for the customer’s personal records if the customer desires it.

eSignature/Upload Documents

eSignature/Upload Documents serves individuals including Title II, Title XVI, and Title XVIII beneficiaries, as well as individuals who do not currently receive any benefits from SSA. eSignature/Upload Documents is limited to first-party individuals, and does not currently allow third parties, including representative payees, to submit documents on behalf of others. Technicians contact the respondent, via email, telephone, or face-to-face interview with SSA, for a business matter (e.g., filing a claim, performing a redetermination, or updating their personal information). During the interaction, the SSA technician requests additional information and offers the opportunity to provide the information electronically via the eSignature/Upload Documents portal. The technician then sends a one-time email or text message containing a link to eSignature/Upload Documents with access instructions. Customers who request a text message as their preferred communication method must first provide consent to text messaging. The electronic submission process is only available within 30 days from the date of the email or text. Concurrently, the technician follows current policy and procedures regarding follow-up and close-out/due process notices. If the respondents do not submit the documents within 10 days, they receive an email or text reminder to complete their submission. Once the respondents click on the link to eSignature/Upload Documents, the

system requires them to authenticate using electronic access (OMB Control No. 0960-0789), ID.me, or Login.gov, and then presents them with the required language concerning the applicable Terms of Service, the Privacy Act Statement, the Paperwork Reduction Act Statement, and any identity proofing and authentication (as per the requirements of those authentication processes). Once the respondents arrive at the eSignature/Upload Documents dashboard, the system presents them with the description of the items SSA requested from them (examples of the documentation SSA may request includes forms or non-standardized evidence to support their request [e.g., pay stubs, bank statements, pension award letters, tax documents, child support payment history, etc.]). Each item SSA requests from the respondent appears as a request card on their dashboard.

To fulfill an eSignature/Upload Documents request, the system guides the respondent through one of three options:

1. Download, complete, save and then upload a PDF, or upload an evidence document, by dragging or browsing from their device and uploading the document to the eSignature/Upload Documents system.
2. Complete and submit a static webform with or without additional uploaded document(s).
3. Complete and submit a dynamic webform with or without additional uploaded document(s).

Once the respondents finish uploading their forms or documents, the system will alert them if the attempted file upload does not meet the file criteria requirements. The respondent then corrects any upload failures before submitting the documents to SSA.

As mentioned above, one submission path prompts the respondent through a dynamic webform. If the form needed from a claimant is available as a dynamic webform, the claimant selects the form within eSignature/Upload Documents and answers each question as it is presented to them. The system uses dynamic pathing to present questions based on the respondent's previous answers. Dynamic webforms contain the same questions as the PDF modalities but adapt by displaying questions based on the customer's previous response. Additionally, the dynamic pathing may require a reordering of the questions presented, or a re-wording of questions in plain language to make the questions clearer for the customer. The dynamic webform questions and responses occur entirely online and does not require any separate upload of the completed form. For the purposes of showing a sample dynamic webform, we included the sample dynamic webform screens for the SSA-4162 (OMB Control No. 0960-0474) as an attachment to this Information Collection Request, and we describe the process for its use in the Addendum, along with a listing of all the other dynamic webforms we plan to implement through FY25 up until Q2 of FY26.

After either uploading the documents, or completing the static or dynamic webform questions, the respondent must select the Submit button to complete the action, and the system will present them with the confirmation page. This page also presents an option to save or print the completed PDF. The respondent receives a successful submission email or text once they have successfully uploaded their document(s) to SSA. The

system notifies the technician through the Technician Experience Dashboard (TED) when the document is available for review and consideration.

eSignature/Upload Documents includes an electronic signature functionality allowing respondents to submit forms requiring a signature. To ensure eSignature/Upload Documents collects respondents' legally enforceable electronic signature, SSA developed an electronic signing process in consideration of the five requirements for a legally valid and binding electronic signature established by the General Services Administration, Federal Chief Information Officers Council guidance in *Use of Electronic Signatures in Federal Organization Transactions*:

- (1) Identification and Authentication of Signer – Relying upon Electronic Access (OMB Control No. 0960-0789) the individual will sign in using Login.gov, ID.me, or using an account created using SSA before September 18, 2021.
- (2) Electronic Form of Signature – SSA uses a check box as the electronic form of signature. eSignature/Upload Documents requires each form to be electronically signed if a signature is required.
- (3) Intent to Sign – We display the following language next to the checkbox through which the respondent will apply their electronic signature:

I reviewed the document name(s) listed above and confirmed that I uploaded the document version(s) I intend to sign. By checking this box, I am certifying that I am the authenticated person named above, and I am applying my electronic signature to the uploaded document(s) listed above. I agree that my electronic signature has the same meaning, legal effect, and validity as my handwritten signature.

The respondent sees the name of the form requested and the file name of the document they uploaded but is not able to preview an image of their uploaded document. However, the system displays the following instructions at the top of the Review and Submit screen:

Please review the information, including the date and document file name(s), to verify you have uploaded the correct document(s) before signing and submitting.

- (4) Signature Attached to or Associated with the Signed Electronic Record – selecting the checkbox associates the signature information with the database records and affixes that information to copies of the forms that users can download and to copies SSA uses for processing or archiving. The respondent associates the electronic signature with the uploaded document and sends it downstream for necessary action and storage in the appropriate repository.
- (5) Preservation of the integrity of the record – SSA protects the integrity of the signed document, for instance, by logging and timestamping the actions the signer

took. SSA stores the record in the official repository which is currently used to store the document.

eSignature/Upload Documents continues to introduce additional forms that we accept as part of the eSignature/Upload Documents process. Some of the additional forms are first-party single-signer forms that require a signature. Provided in the attached Addendum is a complete list of forms SSA included in the eSignature/Upload Documents system, as well as the forms we intend to add in FY25. This list includes forms that we will add as webforms, both static and dynamic. Respondents can complete static webforms entirely online, but the questions and format follow the PDF version of the form. Dynamic webforms, as mentioned previously, contain the same questions as the PDF but use dynamic pathing to adapt to respondents' needs by displaying questions based on the customer's previous responses.

As noted in # 12 below, the specific forms that respondents submit through eSignature/Upload Documents retain their existing OMB Control Numbers, reflecting the fact that the eSignature/Upload Document Paperwork Reduction Act (PRA) approval is for the system we use to collect form submissions, but not the actual questions on the forms themselves. While we anticipate the use of eSignature/Upload Documents will reduce the overall burden associated with submitting forms, SSA continues to document any burden reduction associated with improved submission within the specific forms' supporting statements.

Commercial Product Alternative Signature (CPAS)

SSA also allows for the submission of certain forms signed using a commercial signature product. Some of these forms also have electronic means for submission. Under the CPAS process, individuals who use a commercial signature product to submit signed forms will ensure that the product is capable of generating an audit trail maintaining the following information in a digital certificate: (1) confirmation that the document was signed using a commercial product; (2) signature details (i.e., name of person who signed the document, date/time document was signed); (3) email and IP address associated with each signature; (4) whether the document was changed after signature; and (5) an identifier that connects the audit trail to the signed document to which it applies. SSA then requires the individual to maintain the digital certificate for a minimum of three years from the date they submitted the form and to produce the digital certificate if the agency requests it. Once the individual uses the CPAS process SSA allows them to submit the electronically signed forms using any method currently accepted for wet-signed forms (e.g., by mail, in person, or via a secured electronic transfer, like Upload Documents or Electronic Records Express, OMB #0960-0753).

Currently, SSA only accepts CPAS for the Commercial Product Alternative Signature (CPAS) process as an additional means for individuals to sign the following eight currently approved agency forms prior to sending them to SSA:

OMB Number	Form Number	Form Title
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0960-0059	SSA-821-BK; SSA-821-APP	Work Activity Report – Employee
0960-0229	SSA-8000-BK; iSSI (Internet modality)	Application for Supplemental Security Income (SSI)
0960-0444	SSA-8001-BK; iSSI (Internet modality)	Application for Supplemental Security Income (Deferred or Abbreviated)
0960-0527*	SSA-1696; SSA-1696-APP	Appointment of Representative
0960-0598	SSA-820-BK; SSA-821-APP	Work Activity Report (Self-Employment)
0960-0618	SSA-16; iClaim (Internet modality)	Application for Disability Insurance Benefits
0960-0623**	SSA-827; i827 (Internet modality)	Authorization to Disclose Information to the Social Security Administration
0960-0810*	SSA-1693; SSA-1693-APP	Fee Agreement for Representation before the Social Security Administration

* While Forms SSA-1696 and SSA-1693 are not, currently, available through the Upload Documents (eSubmit) Portal, we offer an electronically signable and submittable PDF version through the Adobe Sign process. However, we hope to expand the Upload Documents Portal to include them in the future.

**Note: SSA may require additional verbal attestation for Form SSA-827 when submitted using the CPAS process. However, if the respondent chooses to submit the SSA-827 through the eSignature/Upload Documents webform, or the Internet i827, SSA will accept it without any additional attestation.

The specific forms that respondents submit through eSignature/Upload Documents (or the CPAS process) retain their existing OMB Control Numbers, reflecting the fact that the eSignature/Upload Document Paperwork Reduction Act (PRA) approval is for the system we use to collect form submissions, but not the actual questions on the forms themselves. While we note the use of eSignature/Upload Documents reduces the overall burden associated with submitting forms, SSA continues to document any burden reduction associated with improved submission within the specific forms' supporting statements.

We identified the following psychological costs based on the requirements for this information collection:

- **Psychological Cost:**
 - o **Requirement for the Program:** eSignature/Upload Documents is a service delivery option which allows respondents to electronically submit sensitive information when doing business with SSA. While some respondents might consider this information sensitive, the information is already required and collected via traditional service channels (e.g., mail and in person delivery) and is intended to provide the agency with the necessary information to process the

respondent's business need. Therefore, the psychological costs for these are already accounted for and considered.

- o **Psychological Cost:** While respondents may consider some of the information collected during the interview as unduly sensitive, eSignature/Upload Documents is merely an option for collecting necessary documents. SSA already considers the individual's privacy concerns regarding such requests as part of the service request, which is typically initiated at the request of the respondent.

We understand these psychological costs may cause respondents to delay their completion of the information collection or cause them to abandon the information collection entirely. However, we require respondents to submit certain information to receive benefits. In addition, we created eSignature/Upload Documents as an alternative option for respondents to privately, and easily, submit documentation electronically to SSA. Respondents may also choose to submit their documentation through mail or in person delivery (as stated above). Therefore, we have taken this potential psychological cost into account when calculating our burden in #12 below.

Respondents are first-party individuals who choose to use the Internet to conduct business with SSA.

3. Use of Information Technology to Collect the Information

We collect this information electronically via the Internet through the eSignature/Upload Documents public facing portal, under the agency's Government Paperwork Elimination Act plan. We also collect this information through other processes (e.g., in-person, mailed, faxed, dropped off) for those who cannot, or choose not to, submit their evidence electronically. We expect the use of eSignature/Upload Documents to reduce the respondent's burden of submitting hard copies of evidentiary documents to the agency and reduce the agency's burden of handling/maintaining hard copies.

4. Why We Cannot Use Duplicate Information

SSA collects the information from these completed forms and delivered evidence elsewhere such as in-office or via mail, however, the agency implemented eSignature/Upload Documents to allow for another method of collection for this information. Since respondents only need to submit the information to SSA once, through their preferred method of submission, eSignature/Upload Documents will not require respondents to submit duplicate information. Rather, individuals can upload completed forms and evidence directly to SSA through eSignature/Upload Documents after authenticating their identity. This process will eventually reduce the need for individuals to mail or deliver their documents to an office in the existing methods of collection. We plan to accomplish this work through a series of releases. Additional releases will reduce the burden of the existing collections. We will prepare change requests for the existing collections to adjust the burden as needed once we implement these forms via the eSignature/Upload Documents portal.

5. Minimizing Burden on Small Respondents

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

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

Failure to collect this information may impact SSA's ability to determine if the applicant is eligible to receive or continue receiving benefits from SSA. We cannot collect the information less frequently as it is collected at the time of application and at the time of any potential change in eligibility. 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 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 16, 2025, at 90 FR 16050, and we received public comments from one advocacy agency (NOSSCR), which we have addressed in the Addendum to the Supporting Statement.

SSA published the second Notice on June 17, 2025, at 90 FR 25734, and we received the same public comments from NOSSCR as they submitted at the 60-day Notice stage (which we addressed in the Addendum).

In addition, we conducted focus group discussions and usability testing with members of the public, both beneficiaries and non-beneficiaries, and will continue to do so as we build upon and enhance this process. We included the results of this study in the attached addendum.

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

We request potentially sensitive evidence or ask questions of a sensitive nature in this information collection. This is to determine if a respondent applying for benefits is eligible under our programs or eligible to continue receiving benefits. In addition, we may ask the respondents for financial information. As we ask for this sensitive information, a respondent may feel stress or resistance to submitting their documentation through eSignature/Upload Documents. We addressed this above in #2.

Before we ask for any information online, the respondents must read and agree to our Terms of Service. The system also displays a Privacy Act Statement to the respondent

before they provide information to SSA. The Terms of Service and Privacy Act Statement together explain what we will and will not do with the information; these also describe the responder's responsibilities; and explain our legal authority for collecting the information.

12. Estimates of Public Reporting Burden

We estimated the information in the chart below based on current management information data on respondents who need to submit additional evidence to SSA. The burden documented for eSignature/Upload Documents reflects the time and effort involved with understanding, navigating, and submitting documents through the online system¹. While we anticipate the use of eSignature/Upload Documents will reduce the overall burden associated with submitting forms, we will eventually document any burden reduction associated with improved submission processes in the specific forms' supporting statements.

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)*	Average Wait Time for Teleservice Center (minutes)*	Total Annual Opportunity Cost (dollars)**
Internet-Based Static or Dynamic Webform (through Upload Documents or CPAS)	115,369	1	5	9,614	\$31.48*	180**	\$11,198,097***

* We based this figure on 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#00-0000).

** We based this figure on the average FY 2025 wait times for teleservice centers (180 minutes), based on SSA's current management information data. This figure reflects the data posted on our public facing website ([800 number performance | SSA](#)) on the date we submitted this document to OMB. As the figures fluctuate daily, the wait times may be different after that date.

*** This figure does not represent actual costs that SSA is imposing on recipients of Social Security payments to complete this online tool; rather, these are theoretical opportunity costs for the additional time respondents will spend to complete the tool. **There is no actual charge to respondents to complete the online tool.**

¹ Note: We capture the actual time associated with respondents completing the specific forms and documentation they submit through eSignature/Upload Documents under the OMB Control Numbers for each of those information collections. Therefore, we only account for the burden to use the Upload Documents portal in this ICR.

We calculated the following Learning Cost time burden based on the estimated time and effort we expect respondents will take to learn about this program, its applicability to their circumstances, and to cover any additional research we believe respondents may need to take to understand how to comply with the program requirements (beyond reading the instructions on the collection instrument):

Total Number of Respondents	Frequency of Response	Estimate Learning Cost (minutes)	Estimated Total Annual Burden (hours)	Total Annual Learning Cost (dollars)**
115,369	1	5	9,614	\$302,651****

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

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 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 5 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 Information Collection Request (ICR) is **9,614** burden hours (reflecting estimated SSA management information data), which results in an associated theoretical (not actual) opportunity cost financial burden of **\$11,500,748**. 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 \$21,953,660. 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	Distribution + Shipping + Material Cost	\$0*

the Form		
SSA Employee (e.g., field office, 800 number, DDS staff) Information Collection and Processing Time	Average FY24 field office employee (\$124,100/yr) x 115,369 responses x 75 second processing time	\$143,402
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	\$390,600
Quantifiable IT Costs	One-time development costs (TMF plus ITIP cost planned to disburse in FY25)	\$21,419,658
Total		\$21,953,660

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

We did not include the cost for some of the forms that we will accept under the eSignature/Upload Documents process, as we have already estimated the costs to the federal government for those forms under their individual OMB approvals. We included a list of these forms we will accept through eSignature/Upload Documents that are OMB approved separately in the Addendum.

The remaining documents that eSignature/Upload Documents will accept through the portal are non-standardized evidentiary documents. SSA regularly accepts each of these additional items through paper submissions which SSA technicians accept, evaluate, and process in accordance with our current business process. The chart above shows the expected costs to the federal government for processing these documents through eSignature/Upload Documents.

15. Program Changes or Adjustments to the Information Collection Request

When we last cleared this information collection we showed an estimated burden for the new information collection of 963,462 hours; however, we are currently reporting a burden of 9,614 hours. This is because we had to estimate the previous figures based on expected usage; however, now we have actual management information (MI) data which shows the current figures. Although the number of responses changed, SSA did not take any actions to cause this change. There is no change to the burden time per response.

* Note: The total burden reflected in ROCIS is **365,335**, while the burden cited in #12 of the Supporting Statement is **9,614**. This discrepancy is because the ROCIS burden reflects the following components: the average of current telephone waiting time + a rough estimate of a 30-minute, one-way, drive burden. 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. Collections of Information Employing Statistical Methods

SSA does not use statistical methods in this information collection.