

**Justification for Non-Substantive Changes for  
my Social Security – Security Authentication PIN (SAP)  
20 CFR 401.45  
OMB No. 0960-0846**

**Background**

On April 25, 2025, OMB approved the Emergency Clearance documentation for the my Social Security – Security Authentication PIN (SAP). Since then, we have implemented the SAP for use with direct deposit phone transactions to mitigate fraud concerns through an increased level of identity proofing.

SAP utilizes the respondent's my Social Security account to generate a one-time passcode, the Security Authentication PIN (SAP), for those individuals who would like to conduct business with SSA for direct deposit changes over the phone. The respondent provides the SAP to the technician who enters it into the Technician Experience Dashboard to verify the one-time passcode. If the code validates, the respondent successfully verifies his or her identity and the technician continues with the direct deposit request, which may include updating bank information or effectuating other pertinent payment method requests. If the code fails validation, the technician allows the respondent to generate a new SAP and try again or offers the option to conduct business either online through the respondent's my Social Security account, or in person at a field office.

While we are currently in the process of renewing the OMB approval for the my Social Security – Security Authentication PIN (SAP), the agency has determined further need to expand the use of the SAP process for other telephone transactions. Specifically, we will use the SAP process for the following additional telephone services:

- Generating a Benefit Verification Letter
- Obtaining a Tax Statement or replacement Form 1099
- Change of Address
- Request for Claims Status

SSA has determined fraud risk associated with the above-mentioned services, which we will mitigate by requesting a SAP prior to continuing to process these requests via the telephone.

As with the current direct deposit SAP request, respondents also have the option to complete these services through their my Social Security accounts, or they may visit a field office.

Due to the sensitive nature of the information, and the need to mitigate fraud for further telephone transactions. We are planning to increase the use of the SAP process by August 18, 2025. Therefore, we are requesting OMB approval by **COB, Friday,**

August 15, 2025.

### **Revisions to the Information Collection**

We are increasing the scope of the SAP process to include more telephone service requests:

- **Change #1:** We are expanding the scope of the SAP process to mitigate fraud for the following telephone services:
  - o Generating a Benefit Verification Letter
  - o Obtaining a Tax Statement or replacement Form 1099
  - o Change of Address
  - o Request for Claims Status

**Justification #1:** SSA has assessed our telephone services and determined further need to mitigate fraud for the above list of services. These services pose fraud risks for the public when they request information regarding their benefits or taxes; when they change their addresses in SSA's system; and when they request the status of their pending claims. We will not change the current SAP process for these services; rather, we are simply expecting an increase in volume of respondents using SAP as we are increasing the scope from one service to five services.

The increase in scope for the use of the SAP process will also increase our public reporting burden for SAP. The following chart shows SSA's expected increase in burden per service added to the scope:

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 Combined Wait Time for Teleservice Center or Field Office in the Dedicated SAP Queue (minutes)**	Total Annual Opportunity Cost (dollars)***
Respondents requesting phone-based assistance changes for sensitive services using the	3,446,050	1	8 <sup>+</sup>	459,473	\$32.66*	6	\$26,261,187***

SAP Process							
Respondents requesting changes for sensitive services who failed SAP over the phone	206,763	1	4	13,784	\$32.66*	6	\$1,125,464***
Respondents requesting sensitive services in a field office who need identity proofing via SAP	344,605 <sup>++</sup>	1	10 <sup>+</sup>	57,434	\$32.66*	23	\$6,190,148***
Respondents who decline to use SAP and visit a field office for in-person identity proofing	3,445,360	1	8	459,381	\$32.66*	23	\$58,138,131***
<b>Totals</b>	<b>7,442,778</b>			<b>990,072</b>			<b>\$91,714,930***</b>

<sup>+</sup> Note: this figure does not include the knowledge-based questions; however, we will use this figure in place of the knowledge-based question figure currently listed under OMB No. 0960-0789 for telephone respondents.

<sup>++</sup> We note that some of these respondents may already have *my* Social Security accounts. For the purposes of this Emergency Clearance, we will assume they need to create an account which is why they needed to go into the field office, and we account for burden to create an account under OMB No. 0960-0789.

\* We based this figure on the average U.S. worker's hourly wages, as reported by Bureau of Labor Statistics data ([Occupational Employment and Wage Statistics](#)).

\*\* We based this figure on the average FY 2025 wait times for the teleservice centers and field offices dedicated direct deposit queue, as well as the combined wait time for the dedicated queue, 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 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.**

SSA will implement the SAP process for the additional four telephone services listed above upon OMB's approval.

Given the current fraud risk for these telephone services, we are requesting OMB approval by **COB, August 15, 2025.**

**Justification for Resubmission of the Information Collection Within a Year of Approval**

We are currently in the process of renewing the OMB approval for the *my Social Security* – Security Authentication PIN (SAP), prior to the expiration date of September 30, 2025 for the Emergency approval. However, as SSA recently determined more telephone fraud risk, we are increasing the scope of this information collection now, prior to submitting the full documentation for approval. SSA feels that the need to mitigate the fraud risk for these telephone services warrants the need to obtain approval prior to end of the regular approval cycle.

**Note:** we will ensure we update the documentation and the 30-day comment period notice with the expanded scope to allow the public to comment on it before we submit the full information collection request to OMB for renewal.