

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

Note: This document is a non-substantive change request modifying an emergency Paperwork Reduction Act (PRA) clearance that was first approved and released in April 2025. On July 18, 2025, the Social Security Administration (SSA) submitted an earlier version of this non-substantive change request to OMB. This earlier draft erroneously implied that features from the April 2025 emergency release that have since been rolled back – namely: 1) the requirement to use this new SAP method and 2) the requirement for members of the public to visit a field office in certain circumstances – were being redeployed in this change request. In fact, this is not the case. This non-substantive change request is to expand the use of the SAP authentication method to other applications besides the original April 2025 one (Direct Deposit), but it is *not* reinstating the April 2025 features that we had already withdrawn. SSA regrets any confusion and concern the documentation error may have caused.

High-Level Overview of this Non-Substantive Change Request

This non-substantive change request expands the use of SAP as a telephone authentication option from its current use, Direct Deposit only, to four additional services:

1. Generating a Benefit Verification Letter;
2. Obtaining a Tax Statement or replacement Form 1099;
3. Change of Address; and
4. Request for Claims Status.

As well, in this document we clarify how the SAP method works, since (as noted above) that has changed since the original April 2025 emergency clearance.

SAP Background

- SAP, or the Security Authentication PIN, is an Internet-based authentication method that enables a higher level of security for Social Security customers who want to use the telephone to conduct business with SSA.
- In April 2025, we first sought and obtained emergency OMB approval for an earlier iteration of SAP, which would be used only for making changes to one's Direct Deposit information on file with SSA. As explained in that emergency clearance, this new authentication method would require members of the public who wanted to make Direct Deposit changes over the phone to establish an (or use an existing) my Social Security account to generate a one-time passcode, the SAP. The caller would then provide this SAP as verification to the SSA technician with whom they are speaking.
- Initially, we also proposed: 1) that callers would be required to use SAP and 2)

that those callers who were unable to complete the SAP validation process for any reason would need to visit a field office to make the desired Direct Deposit changes. However, in response to public feedback, we subsequently removed both the obligation to use SAP and the requirement for anyone to visit a field office if SAP did not work.

- Instead, we allowed for the use of a different, older (but not in-person) method, Knowledge-Based Authentication (KBA; approved under OMB No. 0960-0596, Request for Internet Services-Authentication, which uses six knowledge-based questions), for those cases where SAP was not working even after the caller worked with one of our technicians multiple times to obtain the requisite PIN.

Current Proposed Non-Substantive Changes

- In this non-substantive change request, we are now proposing to expand the use of SAP from Direct Deposit changes only to the following additional functions:
 - o 1) Generating a Benefit Verification Letter;
 - o 2) Obtaining a Tax Statement or Replacement Form 1099;
 - o 3) Change of Address; and
 - o 4) Request for Claims Status.
- **SAP works as follows:**
 - o 1) The automated telephone system will ask callers if they have a **my Social Security** account. If they do, they will be asked if they want to generate a SAP code.
 - o 2) If the respondents choose to use the SAP process, the system will provide them with a direct link to the SAP screen using a vanity (uniquely, one-time generated) URL, and this URL will ask them to log into their **my Social Security** account.
 - o 3) Once in their **my Social Security** account, the system will generate a SAP code (using the “Generate PIN” button on the secured web page). This code is valid for three hours, so if they are disconnected, callers can still use this SAP if they are within the three-hour period.
 - o 4) Callers will be asked to input both their Social Security Numbers and the SAP code.
 - If the SSN and SAP match the information in our systems, the automated system will allow the callers to continue to the requested service.
 - If the information does not match, the system will allow the callers to generate a new SAP, or it will offer to ask the KBA questions so the callers can continue to the requested service.

- **Note:** at any time, callers may drop out of the automated system to speak with an SSA technician.
- In this release, if SAP does not work with the automated system, callers are automatically sent to a technician for assistance. Since the technician will not have access to any information the caller previously input in the system, the technician will need to start authentication from scratch.
- Of note, if respondents choose from the outset not to use the SAP process, they will instead be routed to our standard KBA authentication method.
- We anticipate implementing this expansion of SAP in early- to mid-August 2025.

Anticipated Burden Changes Associated with this Change Request

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 in the Dedicated SAP Queue (minutes)**	Total Annual Opportunity Cost (dollars)***
Respondents requesting phone-based assistance changes for sensitive services using the SAP Process	3,446,050	1	8	459,473	\$32.66*	6	\$26,261,187***
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	344,605	1	10	57,434	\$32.66*	23	\$6,190,148***

services who chose to visit a field office who need identity proofing via SAP							
Respondents who decline to use SAP and instead use KBA	3,445,360	1	8	459,381	\$32.66*	23	\$58,138,131***
Totals	7,442,778			990,072			\$91,714,930***

* 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 dedicated direct deposit 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.