90Supporting Statement for Forms SS-5, SS-5-FS
Application for a Social Security Number (SSN) Card, the Social Security Number
Application Process (SSNAP), and the Online Social Security Number Application
Process (oSSNAP)
20 CFR 422.103 - 422.110
OMB No. 0960-0066

A. Justification

1. **Introduction/Authoring Laws and Regulations**
   Section *205(c)(2)(B)* of the *Social Security Act* and section *20 CFR 422.103-422.110*
   of the *Code of Federal Regulations (Code)* authorize the Social Security
   Administration (SSA) to assign Social Security numbers (SSNs) and issue SSN cards
   for those numbers. Section *20 CFR 422.107* of the *Code* discusses the evidentiary and
   interview requirements for obtaining an SSN. Section *20 CFR 422.103* specifies that
   an individual may apply for a new or replacement SSN by completing an
   SSA-approved application designed for this purpose. Section *20 CFR 422.103(e)(2)*
   of the *Code* places annual and lifetime limits on the number of replacement SSN cards
   SSN holders may receive (no more than three in a year and 10 per lifetime).

2. **Description of Collection**
   SSA requires the information we collect from the form SS-5 and SS-5-FS to issue
   original, and replacement cards, and to change or correct information on a Social
   Security number record. The agency uses a number of different instruments to collect
   this information depending on when the collection happens (such as at birth or later in
   life), the evidence we need to collect from the respondent, the need to validate the
   respondent's identity, and the different modes available (including paper applications,
   electronic, and in-person interviews).

   The instruments and modes we use to collect data for original and replacement SSN
   cards include:

   - **Form SS-5/SS-5-FS** – The agency uses this paper application to collect data to
     request an original and replacement Social Security number (SSN) card or a
     change or correct information on a social security number record. All respondents
     can use this form and submit it in person at a field office or Foreign Benefits Unit.
     Form SS-5-FS collects the same information as the SS-5 but includes separate
     instructions for respondents who are responding to the information collection
     overseas. An overseas respondent could submit an SS-5, but the SS-5-FS's
     instructions are likely more relevant to them than those on the SS-5.

- **Social Security Number Application Process (SSNAP)** – SSA technicians use this web-based, Intranet application internally to collect and store SS-5 data during an in-office interview with respondents.

- **Enumeration at Birth (EAB)** – for newborns, a hospital, birthing center, or licensed midwife collects and submits information to SSA under the EAB process. The vast majority of applications for original SSN cards utilize EAB. In this process, parents of newborns provide information required to register newborns. This information is sent to State Bureaus of Vital Statistics (BVS) who send the information to SSA's National Computer Center. SSA uses the information to assign a newborn an SSN and issue a Social Security Card. EAB also includes SSA receipt of race and ethnicity information for the newborn and parent(s) if the parent(s) consent to release of this voluntary information. With parental consent, States and Jurisdictions ask questions to collect a newborn's race and ethnicity information. If the parent(s) give consent, the State BVS electronically shares the race and ethnicity of parent(s) and newborn, consistent with the EAB process. State BVS send the information electronically to SSA's National Computer Center through data-matching agreements. SSA uploads the data to the SSA mainframe along with all other enumeration data and assigns the newborn a Social Security number (SSN) and issue a Social Security card.

- **Online Social Security Number Application Process (oSSNAP) –** The Online Social Security Number Application Process (oSSNAP) is a streamlined Internet application that collects information similar to the paper SS-5 form. Depending on the applicant and their reason for applying, oSSNAP supports either a partially automated or fully automated Social Security Number (SSN) card processing experience.

  Application Process Overview

  o **Partially Automated Process:**
    Applicants begin their SSN card application online through oSSNAP and receive a list of required evidentiary documents. To complete the application, they must schedule an appointment, either through the Enterprise Scheduling System (ESS) application (OMB No. 0960-0828) or by calling the National 800 number, then visit a local SSA office in person. This process applies to certain individuals applying for an original SSN card, a no-change replacement card, a name-change (due to marriage), or other data changes (such as date of birth, place of birth, parent's names and SSNs, or citizenship status).

o **Fully Automated Process:**
Eligible adult individuals applying for a no-change or name-change (due to marriage) replacement SSN card can complete the entire process online. They submit the required evidence through the oSSNAP Internet application which is verified through the Driver's License Data Verification (DLDV) and/or the National Association for Public Health Statistics and Information Systems (NAPHSIS) and do not need to schedule an in-person appointment.

Access and Verification

Members of the public can access oSSNAP by clicking "Request a replacement Social Security card" through the mySocial Security portal on SSA's public website. oSSNAP supports no-change and last name change (due to marriage) replacement SSN cards by leveraging identity validation data exchanges with most State Departments of Motor Vehicles through the DLDV. Additionally, a contract with the NAPHSIS enables verification of state marriage data, allowing oSSNAP to issue name-change replacement cards due to marriage. Efforts are ongoing to expand oSSNAP's capabilities to serve additional populations.

Data Prefill for Authenticated Users

For users who access oSSNAP through an authenticated mySocial Security account, the system automatically pre-fills number holder information such as date of birth, place of birth, name, and parent's names using SSA data.

- **Enumeration Quality Review (EQR) Process** – SSA's EQR process measures the quality of various aspects of the enumeration process. Specifically, the EQR measures the accuracy of SSNs assigned for original SSN cards processed through SSNAP and assigned through EAB (both processes discussed above). The last contact reviews were conducted in fiscal year 2022.[1]

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

- Psychological Cost #1:
    o Requirement for the Program: We ask respondents to submit prior names they have used which SSA may have on file before we can send them a replacement SSN card.

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[1] SSA is not currently conducting contact reviews. SSA will notify OMB via change request, if we do resume contact reviews.

- o Psychological Cost: Some respondents may perceive this request as unnecessary or invasive, as they no longer use the prior name(s). However, we need this information to ensure we can replace their SSN card with their new name.

- Psychological Cost #2:
  - o Requirement for the Program: We request voluntary race and ethnicity information from respondents on all of our enumeration modalities.

  - o Psychological Cost: Some respondents may consider this as invasive. However, we mitigate this by making this section voluntary to submit.

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 full completion of this collection to receive an SSN card. Therefore, we have taken this potential psychological cost into account when calculating our burden in #12 below.

The respondents for this collection are applicants for original and replacement Social Security cards, or individuals who wish to change information in their SSN records, who use any of the modalities described above.

3. **Use of Information Technology to Collect the Information**
   As discussed above, we conduct some aspects of this information collection electronically, while other aspects require in-person submission.

   The vast majority of respondents for original SSN cards are enumerated at birth. While the collection method varies from state-to-state, all EAB requests are electronically transmitted to SSA's National Computer Center through electronic interfaces with the State vital records agency. SSA uses the information from the State to enumerate the infants and issue SSN cards through an automated process.

   U.S.-based citizens who are able to access the *my*Social Security portal may be able to use the oSSNAP process described above to request replacement cards via a fully automated online process (formerly the iSSNRC Webservices), once our system authenticates their identities. oSSNAP supports either partially automated or fully automated processing depending on the applicant and their reason for applying. The agency is able to validate identity with State DMVs via a contractor (AAMVA) and marriage data from participating states with NAPHSIS (contractor). We limit fully automated processing to individuals applying for themselves (first party) and make this option accessible only through the authenticated *my*Social Security portal (OMB No. 0960-0789), this level of electronic verification sufficiently balances risk with the service provided.

All U.S. based citizens who cannot access the *my*Social Security portal or request a replacement SSN card via the authenticated oSSNAP path, can initiate an online replacement SSN card request, including replacement cards with a name change, via the authenticated self-hybrid or unauthenticated oSSNAP web application. This process is only partially automated, as respondents must go to an SSA field office with the requisite documentation for an SSA technician to complete the application process via SSNAP. Because the provision of services has a higher risk level than an SSN card replacement, SSA currently requires in-person identity verification for those who cannot access the *my*Social Security portal.

Certain respondent groups have the ability to initiate their request electronically by submitting this information through oSSNAP; however, they must go to an SSA field office to complete the application process: all respondents who are non-U.S. citizens; respondents who are applying for an original SSN card; and respondents who are seeking to change the date of birth, place of birth, parent's names, or citizenship status.

Including the EAB process and all requests for original SSN cards, SSA processes approximately 49% of respondents fully electronically each year. Excluding the EAB process and only considering replacement card requests, SSA processes approximately 16% of respondents fully electronically each year.

4. **Why We Cannot Use Duplicate Information**
   The nature of the information we collect and the manner in which we collect it preclude duplication. SSA does not use another collection instrument to obtain similar data.

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 did not use Forms SS-5 and SS-5-FS, the oSSNAP application, and EAB, the public would have no way to apply for SSNs and SSN replacement cards. Since the public needs SSNs to maintain earnings records; apply for jobs; file tax returns; open accounts at financial institutions; etc., not having an SSN or SSN card would be a great disadvantage. 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 collect 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 September 3, 2025, at 90 FR 42667, and we received no public comments. The 30-day FRN published on December 17, 2025, at 90 FR 58678. If we receive any comments in response to this Notice, we will forward them to OMB. We did not consult with the public in the revision of this form. We did not consult with the public in the revision/maintenance of this form.

9. **Payment or Gifts to Respondents**
   SSA provides no payment 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**
   The following chart shows the burden for each application scenario. Respondents for each of these scenarios may use any of the current modalities available for the SS-5 and SS-5-FS, unless otherwise indicated in the chart below:

Application Scenario	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 in Field Office (minutes) **	Total Annual Opportunity Cost (dollars) ***
EAB Modality							
Hospital staff who relay the State birth certificate information to the BVS and SSA through the EAB process	3,599,746	1	10	599,958	$26.91*	0**	$16,144,870***
oSSNAP Modality							
Adult U.S. Citizens requesting a replacement card	2,218,960	1	10	369,827	$32.66*	0**	$12,078,550***

with no changes using oSSNAP (previously iSSNRC)							
Adult U.S. Citizens requesting a replacement card with a name change using oSSNAP (previously iSSNRC)	37,820	1	10	6,303	$32.66*	0**	$205,856***
Adult U.S. Citizens providing information to receive a replacement card through the oSSNAP+	2,334,386	1	10	389,064	$32.66*	16**	$33,037,778***
Adult U.S. Citizens providing information to receive an original card through the oSSNAP+	90,952	1	10	15,159	$32.66*	16**	$1,287,229***
Adult Non-U.S. Citizens providing information to receive an original card through the oSSNAP+	786,589	1	10	131,098	$32.66*	16**	$11,132,324***
Adult Non-U.S. Citizens providing information to receive a replacement card through the oSSNAP+	214,286	1	10	35,714	$32.66*	16**	$3,032,710***
SSNAP/SS-5 Modality							
Respondents who do not have to provide parents' SSNs	6,764,440	1	9	1,014,666	$32.66*	16**	$92,052,765***
Respondents	221,751	1	9	33,263	$32.66*	16**	$3,017,686***

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whom we ask to provide parents' SSNs (when applying for original SSN cards for children under age 12)							
Applicants age 12 or older who need to answer additional questions so SSA can determine whether we previously assigned an SSN	796,688	1	10	132,781	$32.66*	16 **	$11,275,244***
Applicants asking for a replacement SSN card beyond the allowable limits (i.e., who must provide additional documentation to accompany the application)	11,885	1	60	11,885	$32.66*	16**	$491,663***
Enumeration Quality Review							
Authorization to SSA to obtain personal information cover letter	1	1	1	1	1	1	1
Authorization to SSA to obtain personal information follow-up cover letter	1	1	1	1	1	1	1
Grand Total							
Totals	**17,077,504**			**2,739,719**			**$183,756,677***

[+] We are not currently sending out these notices; however, we included a 1-hour placeholder burden for these notices in the event we need to send them out in the near future.

* We based this figure on average Medical Records Specialist, and average U.S.

worker's hourly wages as reported by the U.S. Bureau of Labor Statistics (Occupational Employment and Wage Statistics).

** We based this figure on the average FY 2026 wait times for field offices (16 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 drafted this notice. As the figures fluctuate daily, the wait times may be different on the publication date of this notice.

*** 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 calculation of the time burden for this collection. OIRA based their estimation on 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)****
11,220,979	1	30	5,610,490	$183,238,603****

****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 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)*****
17,077,504	1	30	8,538,752	$278,875,640*****

*****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 the average time in minutes listed in the chart above accurately shows the average burden per response for reading the instructions, gathering the facts, and answering the questions. Based on our current management information data, the current burden information we provided is accurate. The total burden for this ICR is **2,739,718** burden hours (reflecting SSA management information data), which results in an associated theoretical (not actual) opportunity cost financial burden of **$645,870,920**. SSA does not charge respondents to complete our applications.

13. **Annual Cost to the Respondents (Other)**
    Under the EAB process, the State BVSs incur costs for participating in EAB. The State BVSs incur a total cost of approximately $23 million for transmitting data to SSA's mainframe. However, please note the States receive reimbursement for these costs, therefore, their overall cost for this information collection is zero.

14. **Annual Cost to Federal Government**
    The annual cost to the Federal Government for these collections is approximately **$534,651,978**. This estimate accounts for costs from the following areas:

Description of Cost	Methodology for	Cost in Dollars*

Factor	Estimating Cost	
Designing and Printing the Form	Design Cost + Printing Cost	$313,881
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	$521,338,097
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	$13,000,000
Quantifiable IT Costs	Any additional IT costs	$0*
Total		**$534,651,978**

* 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, we often do bulk mailings and cannot track the cost for a single mailing. In addition, 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 information collection in 2023, the burden was 1,928,937 hours. However, we are currently reporting a burden of 2,739,719 hours. This change stems from a significant increase in the number of respondents applying for original and replacement cards due to both a fluctuation in population, as well as our expanded

services since 2023.

In addition, as we are not currently conducting the EQR survey, we are using a one-hour placeholder burden in the chart above to renew the collection without an associated burden, which minorly reduces the burden for this information collection. When we choose to conduct the EQR survey again, we will submit a Change Request to revise the burden accordingly.

* **Note:** The total burden reflected in ROCIS shows the additional combined time totals for the field office and telephone call system wait times (for those ICs that require them) as well as the rough estimate of a 30-minute, one-way, drive time in our calculation of the time burden (for those ICs requiring field office visits), and a 30-minute learning cost. As a note, SSA has decreased the wait times for field office and telephone calls since 2023, which is reflected in these figures. This is why the burden estimates on ROCIS do not match the chart in #12 above.

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

17. **Displaying the OMB Approval Expiration Date**

Paper Forms SS-5, SS-5-FS
OMB granted SSA an exemption from the requirement to print the OMB expiration date on its program forms. SSA produces millions of public use forms with life cycles exceeding those of an OMB approval. Since SSA does not periodically revise and reprint its public-use forms (e.g., on an annual basis), OMB granted this exemption so SSA would not have to destroy stocks of otherwise useable forms with expired OMB approval dates, avoiding Government waste.

oSSNAP & SSNAP
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 for this information collection.