

**Supporting Statement for Electronic Records Express (ERE) and Appointed
Representative Online Services (AROS)
20 CFR 404.1512 and 416.912
OMB No. 0960-0753**

A. Justification

1. Introduction/Authoring Laws and Regulations

Electronic Records Express (ERE) allows medical and educational providers to request payments and electronically submit disability claimant data to the Social Security Administration (SSA). Medical providers and other third parties with connections to disability applicants or recipients (e.g., representative payees, teachers and school administrators for child disability applicants) can use this system.

In addition, Appointed Representative Online Services (AROS) allows appointed representatives access to the Appointed Representative Services, which provides the ability for the third party appointed representatives to view and download documents within their clients' disability files online, and also allows SSA to provide online copies of documents and digital audio hearing recordings contained in disability claimants' files to the claimant's third-party representative.

The agency collects this information in accordance with Sections 20 *CFR* 404.1512 and 416.912 of the *Code of Federal Regulations*.

2. Description of Collection

Electronic Records Express (ERE) is a web-based SSA system that allows medical providers, educational providers, and other third parties, such as appointed representatives, teachers, and school administrators, to electronically submit disability claimant evidence to SSA after completing the required registration process. SSA and State Disability Determination Services (DDS) employees use ERE to request and receive medical and educational records needed to determine eligibility for disability benefits. When the available evidence is insufficient, SSA also uses ERE to order and receive consultative examination reports. Third party ERE respondents currently register to use ERE through our Integrated and Registration Services (IRES, OMB No. 0960.0626) authentication process.

SSA also uses AROS to allow appointed representatives to securely access online copies of documents and digital audio hearing recordings contained in their clients' disability claim files. Through AROS, appointed representatives can also obtain case status information for their disability claimants. To ensure only authorized people access AROS, SSA requires appointed representatives to complete registration through our eAccess authentication platform (OMB No. 0960-0789), which authenticates and identity proofs the respondents through Login.gov or ID.me, if they wish to use this system.

During the adjudication of some applications and redeterminations, SSA may determine that the agency requires additional evidence to support development and adjudication of

the claim beyond what the claimant initially provided. In addition, appointed representatives may need to submit evidence or review their claimants' submitted records. ERE serves as a one-stop Internet-based platform for SSA to request information from registered third parties; allow registered third parties to securely submit evidence and information to SSA; and AROS allows appointed representatives to access their claimant's information or submit information to SSA on behalf of their claimants.

The agency uses ERE for the following purposes:

- To work with medical providers regarding:
 - Requests of medical evidence of record (MER);
 - Submission of MER;
 - Requests of consultative examinations (CE);
 - Submission of CE results;
- To work with school administrators and teachers of child disability applicants or recipients to request and receive educational records;
- To allow for third parties to request payments for services (e.g., submission of MER, CE, and educational records; or for service as an appointed representative);

Medical Evidence of Record (MER) and Consultative Examinations (CE): As mentioned above, there are instances when the agency needs additional MER or to request a CE. SSA uses ERE to notify registered medical sources of the MER or CE requests, after which the medical sources submit any related information through the ERE platform for the agency to review. Once the medical source submits evidence or CE results to SSA, they can also request payment for these services through the ERE.

Educational Records: The agency also may request educational records for additional information regarding school enrollment, and function in a school setting, for child disability applicants. In these cases, SSA requests information from teachers, school administrators, or custodians of school records. We allow these educational providers to register an ERE account to submit the information to SSA, or they may submit the information via mail.

Note: SSA does not allow new medical or educational sources to register in ERE on their own. Instead, SSA identifies potential new participants through a variety of outreach and contact mechanisms including:

1. **Helpdesk inquiries:** The ERE Helpdesk receives email and telephone inquiries from medical sources and refers interested sources for registration.
2. **Ad hoc requests:** State DDS or SSA Regional Offices identify medical sources that may benefit from ERE and refer those sources to SSA for outreach and registration.
3. **High-volume provider lists:** State DDS offices or SSA Regional Offices identify high-volume providers and provide their information to SSA so SSA can conduct outreach and encourage those providers to enroll in ERE.

4. **Target lists:** SSA analyzes the Service Delivery Record (SDR) database to identify providers that frequently submit medical evidence by paper or fax. SSA uses these lists to conduct targeted outreach and encourage providers to enroll in ERE.
5. **Self-Referral:** A potential vendor learns of ERE from another vendor or SSA's website, and requests SSA create an account.

During the registration process SSA or state agency employees conduct the registration by phone or in person and then key the information into ERE. After completing the registration process, the registered user can provide evidence to the agency and may request payment for providing evidence through the ERE website. SSA and state agency employees request the medical and educational records collected through the ERE website. The agency uses the information collected through ERE to make determinations on submitted applications for benefits (either OMB No. 0960-0618 for Social Security Disability Income payments, or OMB No. 0960-0444 for Supplemental Security Income payments). We also use the ERE website to order and receive consultative examinations when we are unable to collect enough medical records to determine disability findings.

In certain circumstances, a medical or educational source may choose not to use the ERE. At the hearing adjudicative level, medical sources who do not submit MER through ERE may submit it via paper forms HA-66 or HA-67, OMB No. 0960-0722, which they can mail or fax to a field office or DDS; and educational providers who choose not to use ERE may submit educational evidence through the SSA-5665 and SSA-5666, OMB No. 0960-0646, using either the paper forms or uploading and submitting the forms and evidence electronically through our Upload Documents portal (OMB No. 0960-0830).

Appointed Representative Services (AROS): the AROS application gives appointed representatives (ARs) online access to case information, documents, and digital audio hearing recordings contained in disability claimants' electronic folders (eFolders). After SSA processes Form SSA-1699, Registration for Appointed Representation Services and Direct Payment (OMB No. 0960-0732), the agency informs the ARs of the ability to register through eAccess as an AR, after which they can access AROS. AROS also allows ARs to view status reports for cases pending at the initial, reconsideration, hearing, and appeals levels. Additionally, ARs can upload documents to and download documents from an eFolder.

Through AROS, the ARs can access the following services:

- View their claimants' electronic folders;
- Request a download of the documents in their claimants' electronic disability folders;
- View pending electronic cases;
- View case listing pages;
- View claimant details pages;

- Request to download the Hearings and Appeals, and Initial/Reconsideration status reports;
- Provide access to business information; and
- Provide access to payment details.

AROS provides a modern platform and user interface for the ARs, as it consolidates actions into a single interface and reduces navigation steps for ARs and their staff, to provide access to the information currently available through ERE-ARS/AARPS. AROS replaces the ERE-ARS and Appeals and Appointed Representative Services (AARPS) application.

AROS provides a dashboard screen which allows the ARs to access all of the current ERE-ARS services. The AROS dashboard enables ARs to quickly see the most recent changes to specific case information. Additionally, AROS displays case information on case listing pages, allowing ARs to access and filter case details directly within the application, rather than requiring the downloading of a spreadsheet. ARs can also use AROS to access business information and fee payments through a single portal for conducting business with SSA on behalf of the claimants. Therefore, AROS provides user-friendly interface that supports search, sorting, and filtering.

There are minimal psychological costs associated with information collection request. The respondents are medical providers who evaluate or treat disability claimants or recipients, and authorized representatives with connections to disability applicants or recipients (e.g., Teachers and school administrators for child disability applicants, and appointed representatives), who voluntarily choose to use ERE and AROS as part of their normal business process or professional activities to submit documents to the casefile. In the five outreach and contact mechanisms the medical sources use to indicate interest in participating with ERE, the most common or frequently used mechanisms are Helpdesk inquiries and Self-Referrals. In addition, we created the AROS dashboard to allow easier access to the ARs to their claimants' information. These mechanisms show that ERE and AROS users initiate contact and participation with ERE. Because respondents request to submit their information electronically using ERE and AROS, we listen to their suggestions for improvement. Therefore, we have not received comments that indicate psychological costs for this information collection.

The respondents are medical providers who evaluate or treat disability claimants or recipients, and other third parties with connections to disability applicants or recipients (e.g., Teachers and school administrators for child disability applicants), and third-party appointed representatives of disability applicants who want to use AROS to electronically access clients' disability files online and submit information to SSA, all of whom voluntarily choose to use ERE or AROS for submitting information or evidence, or accessing electronic disability files.

3. Use of Information Technology to Collect the Information

ERE and AROS are web-based programs which SSA originally developed under the aegis of, and in accordance with, the Government Paperwork Elimination Act. We

collect all information electronically online (or by telephone in limited situations when the website is down). Based on our data, we estimate approximately 100% of respondents under this OMB number use these electronic platforms. However, not all respondents use ERE to submit MER or educational evidence (see #2 above). Additionally, ERE account registration is not fully electronic and requires a phone or in-person interview.

4. Why We Cannot Use Duplicate Information

The nature of the information we collect and the manner in which we collect it precludes duplication. SSA does not use another collection instrument to obtain similar data.

5. Minimizing Burden on Small Respondents

This collection may affect small businesses or other small entities if, they are medical practices or schools seeking to register for ERE or electronically request reimbursement. However, this impact is a positive one, since it will save these small business and entities the longer completion times required by paper mail processes. We minimize the burden by using the information we collect during registration to simplify the steps for providing evidence.

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

If we did not conduct this information collection, we would have no means of: (1) registering medical providers, school administrators, appointed representatives, and other users for ERE; (2) allowing medical providers or appointed representatives to request reimbursement electronically; or (3) providing access to appointed representatives to their clients' electronic files. Because we collect this 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 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 July 31, 2026, at 91 FR 48470, and we received no public comments. The 30-day FRN published on September 24, 2026, at 91 FR 60677. 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 development revision of this form.

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

Please see the burden chart below:

Method of Completion	Number of Respondents	Frequency of Response	Average Burden Per Response (minutes)	Estimated Total Annual Burden (hours)	Average Theoretical Cost Amount (dollars)*	Total Annual Opportunity Cost (dollars) ***
ERE (ERE sign-ins and activities)	6,121,008	1	10	1,020,168	\$51*	\$52,028,568**
ERE (account registrations)	3,668	1	35 ⁺	2,140	\$51*	\$109,140**
AROS (technician-assisted actions)	500	1	15	125	\$89.35*	\$11,169**
AROS (Number of downloads)	135,477,567	1	1	2,257,959	\$89.35*	\$201,748,726**
Totals	141,602,743			3,280,392		\$253,897,603**

⁺ This figure includes the minimal 1-minute teleservice wait time to connect with an SSA technician for the medical or educational providers' registration process.

* We based this figure on the average combined Healthcare Practitioners and Technical Occupations Worker's (\$52.26), Secondary School Administrator's (\$48.99) hourly salary (\$51 total), and an average Lawyer's (\$89.35) hourly salary, as reported by Bureau of Labor Statistics data ([Occupational Employment and Wage Statistics](#)).

This figure does not represent actual costs that SSA is imposing on individuals; rather, these are theoretical opportunity costs for the additional time respondents will spend to complete the information collection. **There is no actual charge to respondents to complete the information collection.

We did not include travel time as per our current management information data, respondents use ERE and AROS

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)*****
4,168	1	15	1,042	\$138,555*****

*****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 **1,10, 15, or 35** 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 ICR is **3,280,392** burden hours (reflecting SSA management information data), which results in an associated theoretical (not actual) opportunity cost financial burden of **\$254,036,158**. 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 **\$219,323**. 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*
Distribution, Shipping, and Material Costs for the Form	Distribution + Shipping + Material Cost	\$0*
SSA Employee (e.g., field office, 800 number, DDS staff) Information Collection	GS-9 employee x # of responses x processing time	\$0**

and Processing Time		
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	\$219,323
Quantifiable IT Costs	Any additional IT costs	\$0*
Total		\$219,323

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

** We have no processing cost for this information collection as the public submits it entirely online with no SSA technician involvement.

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 2023, the burden was **1,034,696** hours. However, we are currently reporting a burden of **3,280,392** hours. This increase is because we are now combining OMB No. 0960-0767 with this information collection. There is no change to the burden time per response. Although the number of responses changed, SSA did not take any actions to cause this change. These figures represent current Management Information data.

*Note: The total burden reflected in ROCIS is **3,281,434** while the burden cited in #12 of the Supporting Statement is **3,280,392**. This discrepancy is because the ROCIS burden also reflects the learning costs. In contrast, the chart in #12 above 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 for this information collection.