

**Justification for the Non-Substantive Changes for  
Social Security Administration's Public Credentialing and Authentication Process  
20 CFR 401.45 & 20 CFR 402  
OMB No. 0960-0789**

Since its establishment in May 2012, SSA uses the Social Security Administration's Public Credentialing and Authentication Process (hereafter-called "eAccess") to provide a secure, centralized gateway to Social Security's public-facing electronic services. We are creating an in-person identity proofing process to allow customers to physically present themselves with identity evidence at a Social Security Administration Field Office (FO). Agents at the FO will help assist customers in-person to obtain an IAL2 identity-proofed Login.gov account that they can use to access Social Security information as well as other state and federal services.

SSA plans to implement this new feature as soon as possible. Therefore, we are asking for OMB's approval of these IT modification revisions as soon as possible, to ensure we can implement this change.

**Revisions to the Collection Instrument**

- **Change #1:** We are updating the burden information for eAccess Login.gov registrations to accommodate the in-person proofing registration option.

**Justification #1:** We are creating an in-person identity proofing process to allow customers to physically present themselves with identity evidence at a Social Security Administration Field Office (FO) to obtain a Login.gov account to access their *my Social Security* information.

- **Change #2:** We are updating the sign-in page to showcase the Social Security Administration seal/logo and change the wording on the buttons.

**Justification #1:** We are updating the look and feel of the screen to enhance the user experience on the sign in screen.

**Estimates of Public Reporting Burden**

We are adjusting the reported burden to this information collection because we are adding a new method of collection and some of our customers will choose the option to identity proof in-person for a Login.gov account. We will continue to monitor the Management Information (MI) data and update the burden accordingly.

See chart below with the updated figures:

| Method 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 in Field Office (minutes)** | Total Annual Opportunity Cost (dollars)*** |
|----------------------|-----------------------|-----------------------|---------------------------------------|---------------------------------------|---------------------------------------------------|-----------------------------------------------|--------------------------------------------|
|                      |                       |                       |                                       |                                       |                                                   |                                               |                                            |

|                                            |                     |   |    |                |          |      |                        |
|--------------------------------------------|---------------------|---|----|----------------|----------|------|------------------------|
| Internet Login.gov Sign-Ins                | 2,003,842           | 1 | 1  | 33,397         | \$33.54* | N/A  | \$1,120,135***         |
| Internet ID.me Sign-Ins                    | 19,545,268          | 1 | 1  | 325,754        | \$33.54* | N/A  | \$10,925,789***        |
| In-Person Proofing Login.gov Registrations | 55,255 <sup>+</sup> | 1 | 10 | 9,209          | \$33.54* | 11** | \$648,630***           |
| <b>Totals</b>                              | <b>21,604,365</b>   |   |    | <b>368,360</b> |          |      | <b>\$12,694,554***</b> |

<sup>+</sup> We estimate the total annual number of in-person proofing Login.gov registrations will be approximately **55,255**. We will revise this number, as needed, after we implement the in-person proofing option and obtain more accurate MI data. In addition, as respondents only need to register once for Login.gov, we anticipate this number to decrease over time.

\*We based this figure on an average U.S. citizen’s hourly salary (\$33.54), as reported by Bureau of Labor Statistics data ([Occupational Employment and Wage Statistics](#)).

\*\* We based this 11-minute figure on the average combined August 2026 wait times for field offices (21 minutes, as captured by management information data and posted on our public-facing website, ([Social Security performance | SSA](#))) and for teleservice centers (1 minute, which represents the average time it takes for a call to be picked up automatically by our systems and then routed to an SSA technician; this figure also comes from management information data). As the figures fluctuate, the actual wait times may differ slightly from the averages reported here. We will update these figures periodically to reflect the most accurate available data. We did not include an in-office wait time for the paper form, as respondents only mail it in; therefore, they do not experience any wait time.

\*\*\* 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.**

Finally, as noted for previous approvals, once we have OMB’s approval to include the updated registration figures, we will roll those numbers into the total login numbers per year when we obtain the next approval for eAccess. While we can pull specific data on the reasons respondents log in to their accounts, it is possible that the respondents log in to complete several actions. Therefore, to avoid double-counting logins, we will account for all logins in one line on the burden chart.

**Future Plans**

Due to the agile nature of our projects, we expect to make more enhancements in the future to

strengthen our electronic access authentication posture. Currently, we are still finalizing our IT modernization plans for these changes. We expect to submit another change request within one to six months to request approval for additional updates to the system, and potentially, update the burden again to include additional users, as we move more authentication requirements behind the eAccess portal.