Justification for Non-Substantive Changes for OMB No. 0960-0811
The Department of the Treasury's Pay.gov Collection Application for Benefit Overpayments
20 CFR 404.501, 404.502, 404.521, and 404.527
OMB No. 0960-0811

<u>Justification for Non-Substantive Changes to the Collection</u>

<u>Background</u>

The Social Security Administration (SSA) is adding an option for respondents to request an email receipt when they use Pay.gov. We believe that approximately 30% of the respondents will request an emailed receipt for their transaction. The addition of email functionality to SSA's application is a requirement provided by the House Ways and Means Subcommittee on Social Security, and was provided after the previous submission of the clearance package. As part of the Commissioner's Digital Transformation Plan for FY 2020, SSA plans to implement these changes as soon as possible. Our new release date for the application, which will include the addition of the email receipt option is **March 28, 2020**.

To enhance the current application, we are also making some very minor language changes to remove typos and clarify the language. In addition, we updated the burden information for this application based on current management information data we have collected. Finally, we also updated both the Privacy Act and Paperwork Reduction Act statements which appear on the screens. We included a full list of the changes we are making on page 3 of the attached PDF of the screens (the changes listed on page 3 also include revisions we made to the new Email Receipt screens. Since those screens are new, we did not include any changes we made in the production of those screens in our list in Change #3 below). We believe these revisions will enhance the application for the respondents.

Revisions to the Collection Instrument

- **<u>Change #1</u>:** Added email button to the receipt screen and additional modal screens for email entry.

  <u>Justification #1</u>: Because of key stakeholder requirements for email functionality, we updated the application with the capability to provide an optional email receipt. This receipt is a notice to the respondents which lists the details of their transaction, but does not request any additional information.

- **<u>Change #2</u>:** Added email confirmation and error messages.

  <u>Justification #2</u>: These messages are necessary to accompany the new email receipt functionality. These messages serve as help screens and inform the respondents when there is an error, or if their request worked.

- **<u>Change #3</u>:** We are making the following minor language revisions to the screens:

    1. We removed the word “below” from the Pay Your Overpayment and the Pay Your Overpayment Confirm Your SSN screens:
        - From: “To get started with paying your overpayment online, enter your Social Security Number (SSN) below:”
        - To: “To get started with paying your overpayment online, enter your Social Security Number (SSN):”

    2. We modified the confirmation language for the Pay Your Overpayment confirmation screen:
        - From: “We highly recommend that you save a copy of your receipt for your records. You WILL NOT be able to obtain a copy of the receipt once you leave this page.”
        - To: “You WILL NOT be able to obtain a copy of the receipt once you exit this page. We highly recommend that you print, save, or email a receipt for your records by clicking View Receipt.”

    3. We removed the “Pay Your Overpayment” header from the Your Receipt screens

    4. We updated the SSA email address on the Email Success screen and other screens, as the old email address was incorrect

    <u>Justification #3</u>: We are making these minor wording changes for clarification purposes and to remove typographical errors. We are also making these changes due to the addition of the email receipt option.

- **<u>Change #4</u>:** We are updating the Privacy Act Statement for these screens.

    <u>Justification #4</u>: We are updating the Privacy Act Statement to align with the addition of email functionality.

- **<u>Change #5</u>:** We are updating the Paperwork Reduction Act Statement.

    <u>Justification #5</u>: We are revising the PRA statement to reflect our current boilerplate language. The current language is now outdated.

<u>Updated Estimates to the Public Reporting Burden</u>

We are updating the current burden information for this application based on our current management information data. The burden data on the chart below reflects data collection over the past eight months since OMB approved them in March 2019. The burden estimate we submitted in January 2019 was based on the management information data we have regarding the number of respondents who need to submit payments to SSA for overpayments, as well as an educated estimate of how many of those respondents would potentially use the new Pay.gov application to submit those payments. Going forward, we will monitor actual usage of the screens when we create our burden estimates for all future PRA-related approval requests.

In addition, we are updating our burden chart to reflect the respondents who may request to receive an email receipt. At this time, we anticipate that about 30% of all current users will request an email receipt. Based on our usability testing, we expect that requesting an email receipt may take up to one minute more for the respondent, thus increasing the average burden per response from 10 minutes to 11 minutes for those who request an email receipt.

The chart below reflects these changes:

Modality of Completion	**Number of Respondents**	**Frequency of Response**	**Number of Responses**	**Average Burden per Response (minutes)**	**Estimated Total Annual Burden (hours)**	**Average Theoretical Hourly Cost Amount (dollars)***	**Total Annual Opportunity Cost (dollars)****
Internet Application (i.e. Pay.gov for Print or Save)	42,700	12	512,400	10	85,400	$16.36*	$1,397,144
Internet Application (i.e. Pay.gov for Email)	18,300	12	219,600	11	40,260	$16.36*	$658,654
Totals	**61,000*****		**732,000**		**125,660**		**$2,055,798**

* We based this figure on an average of both the average hourly U.S. wage (for retirees) and our average hourly DI payments. Since we do not track whether the respondents are retirees or disability recipients, we are not able to refine this figure any further.

** This figure does not represent actual costs that SSA is imposing on the public to complete this application; rather, these are theoretical opportunity costs for the additional time respondents will spend to complete the application. **<u>There is no actual charge to respondents to complete the application</u>**.

*** This figure has been updated from our original submission to reflect a subsection of the eligible respondents who have made check or credit card payments via the present-day SSA electronic field office remittance process.

The total estimated burden for this ICR is **125,660** hours (reflecting current SSA management information data), which results in an associated theoretical (not actual) opportunity cost financial burden of **$2,055,798**. This figure represents the theoretical amount a respondent could have earned during the time they completed the form. SSA does not actually charge respondents to complete our applications.

As noted above, we will implement these changes in **March 2020**.