

Supporting Statement for Forms SS-5, SS-5-FS
Application for a Social Security Number (SSN) Card, the Social Security Number
Application Process (SSNAP), the Online Social Security Number Application Process
(oSSNAP) and the Internet SSN Replacement Card (iSSNRC) Application
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. 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 information collected from the form SS-5 and SS-5-FS to be able to issue original, replacement cards and 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 it needs 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).

Instruments and modes used to collect data for original and replacement SSN cards include:

Form SS-5/SS-5-FS – This is a paper application used 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) – a web-based, Intranet application used internally by SSA personnel to collect and store SS-5 data during an in-office interview.

Enumeration at Birth (EAB) – under this process, parents of newborns provide hospital birth registration clerks with information required to register these newborns. Hospitals collect this information via the State’s birth registration form. Hospitals send this information to State Bureaus of Vital Statistics (BVS), and they send the information to SSA’s National Computer Center. SSA then uploads the data to the SSA mainframe along with all other enumeration data and we assign the newborn a Social Security number (SSN) and issue a Social Security card.

Internet Social Security Number Replacement Card (iSSNRC) – this Internet application collects information similar to the paper SS-5 for no-change replacement SSN cards for adult U.S. citizens. The iSSNRC modality allows certain applicants for SSN replacement cards to complete the Internet application and submit the required evidence online rather than completing a paper Form SS-5 and visiting an SSA office (i.e., iSSNRC is fully automated). Members of the public who have a [mySocial Security](#) account may access iSSNRC by clicking “Request a replacement Social Security card” via the [mySocial Security](#) portal from SSA’s public website. Currently the iSSNRC is limited to no-change replacement SSN cards because we secured identity validation data exchange with the majority of State Departments of Motor Vehicles. However, we continue to explore ways to expand the capabilities and functionalities of the iSSNRC process to allow for additional populations.

Online Social Security Number Application Process (oSSNAP) – this Internet application which does not require access to the [mySocial Security](#) portal collects information similar to when a respondent is submitting a no change, or name-change replacement SSN request for U.S. citizens (adult and minor children). oSSNAP will allow certain applicants for SSN replacement cards to start the application process online, receive a list of evidentiary documents, and then submit the application data to SSA for further processing by SSA employees. Applicants will need to visit a local SSA office to complete the application process (i.e., oSSNAP is partially automated).

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). SSA uses Form SSA-2935-OP1 to serve as a disclosure form that we use for the EQR process to obtain authorization from applicants, so we can request information from third parties (i.e., custodians of records). This authorization allows SSA to request: (1) state BVSs

to release the certified record to SSA; (2) applicants to send the original document directly to SSA; or (3) applicants or their authorizers to send a copy of the authorizer's (parent's or an SSA employee's) valid identification.

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; as well as applicants for SSN cards through the SSNAP and EAB process who take part in our EQR.

3. **Use of Information Technology to Collect the Information**

As discussed above, some aspects of this information collection can be conducted electronically, while other aspects require in-person submission.

The vast majority of respondents for original SSN cards are enumerated at birth. The method in which this information is collected varies from state-to-state, but 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 [mySocial Security](#) portal may be able to use the iSSNRC process described above to request replacement cards via a fully automated online process, once our system authenticates their identities. Respondents cannot use iSSNRC to request changes to SSN cards. iSSNRC is fully automated because the agency is able to validate identity with State DMVs via a contractor (AAMVA). Because iSSNRC is limited to individuals applying for themselves and does not allow name changes, and because iSSNRC is accessible only through the authenticated [mySocial Security](#) portal, this level of electronic verification sufficiently balances risk with the service provided.

All U.S.-based citizens who cannot access the [mySocial Security](#) portal or request a replacement SSN card via iSSNRC, can initiate an online replacement SSN card request, including replacement cards with a name change, via the oSSNAP web application. This process is only partly automated, as respondents must go to an SSA field office with the requisite information to complete the process. Because the provision of services has a higher risk level than simply SSN card replacement, SSA requires in-person identity verification at this time.

There are certain respondent groups who do not have the ability to submit this information request electronically: 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 80% of respondents fully electronically each year. Excluding the EAB process and only considering replacement card requests, SSA processes approximately 12% 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 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 February 5, 2020, at 85 FR 6671, and we received the following public comment:

- *Comment:* The commenter stated that the phrasing for parents' names on the SS-5 is confusing particularly for those who have changed their names for reasons other than marriage or divorce, or when a father's name was changed due to marriage. The commenter suggested that SSA should change the phrasing of the parents' names to follow the way many states deal with it upon a birth certificate. Per the commenter, many states require parents to state their pre-marriage name on a birth certificate, unless that name was legally changed for another reason (e.g., adoption, gender change, court order, etc.). The commenter stated that the practice of asking for a parent's name at their birth, without any further clarification, may lead to issues, as it could result in a no-match situation with the name as it appears on the birth certificate (in those cases where the birth certificate was legally changed to reflect a name change).

- o *SSA Response*: When an individual files an application for a Social Security Number for the first time, they must provide the parent’s names as they appear on an evidence document (i.e. original or amended birth certificate, final adoption decree). We document the information from the evidence provided into our records. If an individual needs to update the parent’s name(s), they must provide an evidence document to support the change before SSA updates its records. While we understand the concerns raised by the commenter, we believe the current version of Form SS-5 accommodates the parent’s name inputs.

The 30-day FRN published on April 7, 2020, at 85 FR 19563. If we receive any comments in response to this Notice, we will forward them to OMB.

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	3,725,000	1	5	310,417	\$23.74*	0**	\$7,369,300***

information to the BVS and SSA through the EAB process							
iSSNRC Modality							
Adult U.S. Citizens requesting a replacement card with no changes through the iSSNRC	1,350,000	1	5	112,500	\$25.72*	0**	\$2,893,500***
oSSNAP Modality							
Adult U.S. Citizens providing information to receive a replacement card through the oSSNAP+	3,500,000	1	5	291,667	\$25.72*	24**	\$43,509,675***
SSNAP/SS-5 Modality							
Respondents who do not have to provide parents' SSNs	7,380,000	1	9	1,107,000	\$25.72*	24**	\$104,397,480***
Respondents whom we ask to provide parents' SSNs (when applying for original SSN cards for children under age 12)	190,000	1	9	28,500	\$25.72*	24**	\$2,687,740***
Applicants age 12 or older who need to answer additional questions so SSA can determine	910,000	1	10	151,667	\$25.72*	24**	\$13,262,955***

whether we previously assigned an SSN							
Applicants asking for a replacement SSN card beyond the allowable limits (i.e., who must provide additional documentation to accompany the application)	7,250	1	60	7,250	\$25.72*	24**	\$261,058***
Enumeration Quality Review							
Authorization to SSA to obtain personal information cover letter	500	1	15	125	\$25.72*	24**	\$8,359***
Authorization to SSA to obtain personal information follow-up cover letter	500	1	15	125	\$25.72*	24**	\$8,359***
Grand Total							
Totals	17,063,250			2,009,251			\$174,398,426***

* We based this figure on average Hospital Records Clerks (<https://www.bls.gov/oes/current/oes292098.htm>), and average U.S. worker's hourly wages (https://www.bls.gov/oes/current/oes_nat.htm#00-0000) as reported by the U.S. Bureau of Labor Statistics.

** We based this figure on the average FY 2020 wait times for field offices, 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 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.**

*The number of respondents for this modality is an estimate based on google analytics data for the SS-5 form downloads from SSA.Gov.

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)****
11,987,250	1	30	5,993,625	\$154,156,035****

****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.

The total burden for this ICR is **2,009,251** burden hours (reflecting SSA management information data), which results in an associated theoretical (not actual) opportunity cost financial burden of **\$328,554,461**. 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 \$14 million for transmitting data to SSA's mainframe. Please note the States receive reimbursement for these costs, which are captured in the \$478 million SSA estimates below as the cost to the Federal government; therefore, there is no cost to the BVSs for this program.

14. Annual Cost To Federal Government

The annual cost to the Federal Government for these collections is approximately \$478 million. This estimate accounts for costs from the following areas:

(1) designing, printing, and distributing the forms; (2) SSA employee (e.g., field office, 800 number, DDS staff) information collection and processing time; and (3) systems development, updating, and maintenance costs.

15. Program Changes or Adjustments to the Information Collection Request

When we last cleared this information collection in 2018, the burden was 1,802,000 hours. However, we are currently reporting a burden of 2,009,251 hours. This change stems from an anticipated decrease in the number of respondents applying for replacement cards at SSA offices and instead availing themselves of the oSSNAP process, which we estimate will have a lower average burden of response as reflected in # 12 above. We will readjust our burden hours via Change Request, if we find that our anticipated burden does not match the burden we are requesting due to the new modality.

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, iSSNRC & 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.