

**Justification for Non-Substantive Changes for Form SSA-455
Disability Update Report
OMB No. 0960-0511**

Background

Form SSA-455, Disability Update Report, is a self-help mailer questionnaire designed to solicit key information from beneficiaries about their medical conditions and any attempts to return to work. SSA uses the recipient's response to help SSA decide whether we refer the case for a full medical CDR. This mailer is the first step in the CDR process and SSA requires no other field office development. There are currently two versions of the SSA-455 form in use: the SSA-455-BK (a paper version which is also available as a submittable PDF), and the SSA-455-OCR-SM (a scannable paper version which includes a bar code with data specific to the recipient).

The SSA-455 process currently requires a wet signature as a fraud deterrent control via penalty for perjury. However, since July 21, 2020, the agency offers alternative methods of completing the SSA-455 telephonically or online using the submittable PDF format. Furthermore, on December 16, 2022, SSA leadership explored, and ultimately approved, a formal risk evaluation in the removal of the SSA-455-BK signature requirement from the form.

In addition, as part of the SSN Removal Legislation (*Pub.L 115-59*), which mandates SSA to either remove the SSN or replace it with the Beneficiary Notice Control number (BNC#), we are replacing the SSN with the BNC# on this form. The mandate specifically applies in cases where SSA mails outgoing forms with pre-populated Social Security numbers visible or redacted on the publications, which includes the scannable SSA-455-OCR-SM. The SSA-455-OCR-SM includes this information in the address header field, as well as a redacted SSN printed vertically on the shoulder margins of page two. Therefore, we are replacing the SSN on the SSA-455-OCR-SM with the BNC#.

Revision to the SSA-455-BK:

- **Change #1:** On Page 2, we revised the form to remove the Signature field next to "Date Report Completed (MM/DD/YYYY)."

Justification#1: The paper SSA-455-BK form will no longer have a signature requirement, as per updated SSA guidelines and policy changes.

Revision to the SSA-455-OCR-SM:

- **Change #1:** On Page 1, we replaced the "Claim Number" data field in the address header to read "BNC #."

Justification #1: We made this change to reflect the removal of the SSN as mandated under *Pub.L 115-59*. Replacement of the SSN with the BNC # will assist

technicians in our field offices and 800# call centers in identifying claimants and will aid the speed by which technicians can render service to the public.

- **Change #2:** On Page 2, we removed the SSN vertically printed in the right-side shoulder margin.

Justification #2: We made this change to reflect the removal of the SSN as mandated under *Pub.L 115-59*. We have verified there are no downstream impacts to this change, and it will not cause any difficulties for the respondents.

- **Change #3:** On Page 2, we added the BNC # data field to top margin area.

Justification #3: We made this change to assist internally when we receive forms out of order, or receive duplicate forms, or multiples of the same form for accompanying beneficiaries. This change will assist SSA technicians with identifying associated forms that would otherwise have no distinguishing features due to Change #2 referenced above.

- **Change #4:** On Page 4, we removed the “Signature, Date and Telephone Sections” and replaced them with “Date and Telephone Sections.”

Justification #4: Removal of signature requirement necessitated removal of related language on the instructions section.

- **Change #5:** On Page 6, we replaced the SSN# with the BNC#

Justification #5: We replaced the SSN# with the BNC# as mandated under *Pub.L 115-59*.

- **Change #6:** On Page 6, We removed the penalty of perjury statement.

Justification #6: The removal of the signature requirement necessitated removal of perjury statement.

- **Change #7:** On Page 6, we removed the “Sign Here” text field and replaced it with “Date Report Completed (MM/DD/YYYY).”

Justification #7: We will no longer require a signature on either version of the paper SSA-455-BK, as per SSA guidelines and policy changes.

SSA will implement the changes to the SSA-455-OCR-SM upon OMB approval.

These actions do not affect the public reporting burden.