

May 5, 2021

***Via Electronic Mail Submission***

Social Security Administration, OLCA  
ATTN: Eric Lowman  
Acting Reports Clearance Officer  
Office of Office of Legislative Development and Operations  
3100 West High Rise  
6401 Security Blvd.  
Baltimore, MD 21235

Office of Management and Budget  
ATTN: Desk Officer for SSA

**RE: Agency Information Collection Activities, Comment Request, Docket No. SSA-2021-0012**

Dear Mr. Lowman:

To supplement our previously filed comments associated with this information collection, the undersigned associations write to offer additional recommendations to enhance the quality and utility of the electronic Consent Based Social Security Number Verification system (“eCBSV”), and minimize burdens on users of the system. As such, we offer the following three priorities that we believe will expand utilization of the eCBSV by more Permitted Entities more quickly, as Congress envisioned:

**1) SSA should enhance its customer service capabilities for eCBSV users.**

The eCBSV system is intended to be available to Permitted Entities on a near-continuous 24/7 basis, with some periods of scheduled downtime. However, if a Permitted Entity experiences a problem with the system outside of certain limited business hours or on weekends, or if the system itself experiences an unexpected issue during these off-times, there currently is no adequate support available to provide timely information or address any issue. Given that Congress directed Permitted Entities to pay for the entire cost of the development and upkeep of eCBSV, we believe it is appropriate and necessary for SSA to provide a customer support mechanism at all times. During the ongoing Initial Rollout phase, for example, participating Permitted Entities have reported numerous unexpected outages or degradations in service during periods of time when SSA customer support staff was not available.

2) **SSA should accelerate its exploration of how to enhance the matching logic of the eCBSV to provide better information to help fight fraud.**

While success of the Initial Rollout is understandably SSA's focus at the moment, we believe it is critical to determine in the near-term how to enhance the quality of the matching response provided by SSA to Permitted Entities. While a binary "yes" or "no" response is helpful, an eCBSV system that incorporates modestly more sophisticated logic into its core functionality would greatly enhance the effectiveness of the system. For example, SSA could enhance eCBSV by providing a "yes" or "no" response for each of the three pieces Fraud Protection Data submitted by a Permitted Entity in the course of making an SSN Verification request. This more descriptive matching response would put users of the eCBSV system in a better position to make more intelligent decision on identity verification of individuals, thereby protecting more consumers from financial and identity fraud. We believe such a change is well within SSA's statutory authority and is directly in line with the stated goal of the Banking Bill.

3) **SSA should create consistency in consent language requirements for all user experiences – digital and paper.**

Last year, OMB and SSA finalized a User Agreement for eCBSV containing approved Written Consent templates, which are memorialized in Exhibit C of the User Agreement. Given the effort that led to this successful outcome, we believe it would be appropriate to allow this approved language to be incorporated into paper-based consumer credit applications, obviating the need for a separate Form SSA-89. This would greatly enhance the user experience for consumers, likely reducing confusion, and reduce burdens for Permitted Entities by streamlining the process for obtaining consumer consent prior to accessing eCBSV.

Thank you for considering these additional recommendations.

Sincerely,

American Bankers Association

Better Identity Coalition

Consumer Bankers Association

Consumer First Coalition

Consumer Data Industry Association