

**Electronic Consent Based Social Security Number Verification
(eCBSV) Annual Public Meeting**

May 28, 2020

1:00 pm – 1:30 pm (EDT)

Talking Points

A. Welcome

- Good afternoon.
- Thank you for joining us for a public stakeholders meeting concerning the Electronic Consent Based Social Security Number Verification service, also referred to as eCBSV.
- Let me introduce myself, my name is Stephanie Walter and I am the Senior Advisor in the Office of Data Exchange, Policy Publications, and International Negotiations and project lead for eCBSV.

B. Overview

- The purpose of today's call is to provide you with an update regarding eCBSV.
- We will begin with a brief background about how eCBSV started then discuss eligibility, enrollment, fees, and payment structure.
- Next, we will cover some key points regarding the eCBSV User Agreement and conclude with information about the initial and expanded rollouts.

C. Background

- As you may be aware, Section 215 of the Economic Growth, Regulatory Relief, and Consumer Protection Act, (also referred to as the Banking Bill) directs Social Security to modify or develop a database for accepting and comparing fraud protection data (name, date of birth, and social security number) provided electronically by a permitted entity, pursuant to consents signed electronically from number holders.
- A permitted entity is a financial institution, as defined in section 509 of the Gramm-Leach-Bliley Act, or a service provider, subsidiary, affiliate, agent, subcontractor, or assignee of a financial institution.

- In response to this statutory directive, we created eCBSV, a fee-based SSN verification service.
- It is important to note that eCBSV does not verify an individual's identity.
- Rather eCBSV allows permitted entities to verify if an individual's SSN, name, and date of birth combination match Social Security's records.
- Before SSA can disclose the SSN verification, the permitted entity must obtain the number holder's written consent signed with either an electronic signature or wet (pen and ink) signature.
- eCBSV will return a match verification of either "Yes" or "No,".
- If our records show that the SSN holder is deceased, eCBSV will return a death indicator.
- SSN Verification requests and responses will be provided via an application-programming interface (API).
- Permitted entities will have the ability to submit one or many verification requests to the eCBSV service via the Verification API for real-time results.
- SSA will also provide an External Testing Environment (ETE) for the eCBSV service to allow permitted entities that are in development to perform interface testing of their software with the eCBSV service.

D. Eligibility & Enrollment

- There are two ways that financial institutions (referred to as permitted entities) can access eCBSV.
 - The first option is to access eCBSV directly through interfacing with SSA's system as a permitted entity.
 - If applying directly with SSA, the financial institution as a permitted entity must complete all registration and enrollment requirements.
 - This option requires the use of Open ID Connect and OAuth 2.0 for authentication and registration.
 - The second option is to access eCBSV indirectly through a permitted entity who is a service provider, subsidiary, affiliate, agent, subcontractor or assignee of a financial institution.

- If applying indirectly through a service provider, etc. the financial institution must independently identify and contract with a service provider. SSA is not a party to the contractual relationship between the financial institution and the service provider.
- Each financial institution electing to access eCBSV indirectly through a service provider must separately complete a financial institution registration with SSA.

E. Fees & Payment Structure

- Social Security is required to collect the full cost of eCBSV services.
- Each permitted entity will be required to pay:
 1. An annual tier based subscription fee based on their estimated transaction volume for the 365-day agreement period; and
 2. An administrative fee of:
 - a. \$3,693 start-up administrative fee for first time enrollees, or
 - b. \$1,691 renewal administrative fee each time the agreement is renewed or amended.
- Fees are calculated based on forecasted systems and operational expenses; agency oversight, overhead, and Certified Public Accountant audit contract costs.
- Social Security will periodically recalculate costs to provide eCBSV services and adjust the fees charged as needed.
- We will notify enrolled permitted entities 60 days in advance of a fee adjustment, which will take effect with their next amendment or renewal agreement. We will also post the fee adjustment in a publically available Federal Register Notice.
- SSA developed a Tier Subscription model to recoup the costs of the eCBSV service.
- Permitted entities selected to use the service will purchase the tier subscription based on their expected transaction volume.
- All payments must be made online via Pay.gov.
- Currently the tiers, associated transaction volumes, and fees are as follows:

[Note: Read each tier level, annual transaction volume, and annual fee]

<u>Tier</u>	<u>Annual Transaction Volume</u>	<u>Annual Fee</u>
1	1 to 1,000	\$400
2	1,001 to 10,000	\$3,030
3	10,001 to 200,000	\$14,300
4	200,001 to 50,000,000	\$276,500
5	50,000,001 to 2,000,000,000	\$860,000

F. User Agreement Key Points

- Once a permitted entity is selected to use eCBSV, it must register for the service by providing SSA with its authorized users' names, phone numbers, email addresses, EIN consent form, and permitted entity certification.
- Permitted entities that are service providers must register for the service by providing SSA with its authorized users' names, phone numbers, email addresses, EIN consent form, and permitted entity certification, as well as an EIN consent form and permitted entity certification for each financial institution it will service.
- SSA will authenticate the permitted entity's EIN as part of the registration process.
- Each permitted entity will be required to review and agree to all terms and conditions in the User Agreement, and
- Submit a Permitted Entity Certification, which is a signed declaration the permitted entity provides to SSA every two years stating that:
 - The entity is a permitted entity.
 - The entity is in compliance with the Banking Bill.
 - The entity is, and will remain, in compliance with its privacy and data security requirements, as described in Title V of the Gramm-Leach-Bliley Act; and
 - The Entity will retain sufficient records to demonstrate its compliance with its certification and this section for a period of not less than two years.

- eCBSV services will not be provided until all registration steps are complete.

G. Initial Rollout

- The enrollment period for the anticipated June 2020 initial rollout was July 17, 2019 through July 31, 2019.
- We designed the initial rollout to support the testing and development of eCBSV business processes, systems requirements, and system performance and capacity.
- As a result, we are only able to support a limited number of users until the expanded rollout.

H. Expanded Rollout

- SSA anticipates implementing an expanded rollout approximately 6 months after the initial rollout.
- Any permitted entity that submitted a valid application before the July 31, 2019 deadline, but that was not selected for the initial rollout, will receive an invitation to complete an application for the expanded rollout.
- Any permitted entity that did not submit a valid application before the July 31, 2019 deadline will not have the opportunity to apply for the expanded rollout, and must wait until the next application period.
- SSA will announce the next application period on the eCBSV website and in a Federal Register Notice.

I. Closing Remarks

- Those are all the updates we have for you today.
- If you have any questions please visit the frequently asked questions page on our website at www.ssa.gov/dataexchange/eCBSV/.
- Thank you again for joining us today and enjoy the rest of your afternoon.