

Word document from SSA to the BTC in Oct. 24, 2019:

Thank you for providing your letter on behalf of the BTC's member firms. We genuinely appreciate the collaboration that we have shared in moving toward a successful implementation of section 215 of the Economic Growth, Regulatory Relief, and Consumer Protection Act (the Banking Bill). As we move forward, we are striving to develop a service in accordance with the Banking Bill that combats synthetic identity fraud. We have addressed your concerns below.

Consent Language

As you know, we intend to provide you with consent requirements that allow financial institutions to incorporate the collection of consent within their individual existing business process, in addition to using the Form SSA-89. We see this as a more efficient process for the financial institutions while still satisfying our regulatory requirements.

We outlined the consent language and our consent requirements in the eCBSV User Agreement. Before we can share the eCBSV User Agreement with you, we are required to submit it to the Office of Management and Budget (OMB) through the Paperwork Reduction Act (PRA) process. During that process, we will post a Federal Register Notice for public viewing and entities can request the proposed eCBSV PRA package, including the proposed User Agreement. We anticipate that occurring around the end of November 2019. Therefore, you will be able to view the proposed consent language at that time.

We hope this information responds to your concerns. Your recommendation to de-couple the consent language from additional material is not feasible. We are required to submit a complete package of all information and requirements at one time for evaluation and publish the approved notice for public review.

Systems Availability and Uptime

We understand that your members are requesting 24/7/365 availability with 99.99 percent reliability. Based on recent discussions with your member firms, we also recognize that you expect a target response time of less than 250ms with 99.9 percent of all transactions delivered in less than 400 ms. We are exploring 24/7/365 availability with scheduled downtime, and our goal is a response time of less than 1 second as technically feasible, which is well within the Banking Bill's requirements of providing responses within 24 hours of submission.

As you pointed out, we indicated on our webpage that we would be providing the same availability or better than that provided by the existing CBSV system. That information was provided in response to questions received from your members at that time; however, as stated above we are working toward improving availability.

Fuzzy Logic/More Detailed Responses

As we have discussed previously, we understand your interest ensuring SSA uses "fuzzy logic" in our verification process. While we are unable to disclose the specific details, we use "fuzzy logic" to address issues in SSN verifications including the examples you provided. Disclosing

the “fuzzy logic” and our processes externally would allow potential wrongdoers to commit fraudulent acts related to identity theft, phishing, and the overall manipulation of the system to obtain information about the number holder’s records. The agency must maintain trusted verifications that protect personally identifiable information, especially since these matching rules are used for so many purposes.

We also understand your interest in expanded verification responses beyond “Yes” or “No.” We are committed to meeting the requirements of the Banking Bill, but the Banking Bill does not require that SSA modify the database or process to provide a reason for the “no match.”

