

**Supporting Statement for  
Supplemental Security Income Simplification (iSSI)  
20 CFR 404.601-404.603; 416.207; 416.210, 416.301, 416.360, Subpart C  
OMB No. 0960-NEW**

**A. Justification**

**1. Introduction/Authoring Laws and Regulations**

The Social Security Administration (SSA) is embarking on a multi-phase effort to simplify the application process for Supplemental Security Income (SSI) recipients.

SSI is a federal income supplement program that provides payments to the aged, blind, and those with disabilities who have little or no income. Under section 1631(e)(1) of the *Social Security Act (Act)*, the Commissioner of SSA promulgates regulations concerning the filing of applications for SSI. These regulations are found in Title 20, Chapter III, Part 416, Subpart C, 20 CFR 416.301-416.360, of the *Code of Federal Regulations (Code)*.

Because of the complexity of the program and its eligibility requirements, SSA must request comprehensive amounts of information from SSI applicants to make accurate eligibility and payment determinations. SSA determines eligibility and payment on a month-to-month basis which may frequently fluctuate. In addition, under section 1611(e)(2) of the *Act* and 20 CFR 416.210 of the *Code*, individuals may not be eligible for SSI if they do not also apply for all other benefits for which they may be eligible. Other benefits include monthly social security benefits under sections 202(a), (b) and (c) and 223(a) of the *Act*.

The public can currently apply for SSI using one of three modalities: (1) a paper application (form SSA-8000 or SSA-8001), (2) a field office interview (in person or by telephone), during which an SSA employee enters applicant data directly into the Consolidated Claim Experience (CCE) and Intranet SSI Claims System screens based upon the SSA-8000 or SSA-8001 questions, and (3) the Internet Claim (iClaim) system through which some individuals can begin their online for SSI when applying for Social Security disability benefits. We refer to the iClaim SSI pathing as iSSI. The amount of information needed to correctly administer the SSI program generally does not change regardless of the modality one uses to file. However, we recognize that many affected members of the public have expressed that the current process is burdensome and challenging. In addition, the COVID-19 pandemic created challenges that have affected our ability to obtain SSI applications in a timely and efficient manner from members of the public. These challenges indicated more than ever the need for underserved communities to access our programs. Thus, we are engaging in a multi-phase effort to reduce barriers and improve access to SSI. The first phase of this effort is modifying the third modality mentioned above to include a simplified online SSI application.

In response to concerns from advocacy groups, SSI applicants and their family members, and members of Congress about the length and complexity of the current SSI application process, SSA conducted exploratory evaluations to simplify the application and provide an online SSI application. Based on the findings, SSA developed a hybrid approach to streamline and simplify the online application form and the modalities we offer across other service channels (i.e., phone and in-person interviews). SSA's hybrid approach consists of two separate steps: (1) capturing the claimant's basic eligibility with a simplified application, and (2) a technician-supported experience to develop additional information necessary to make an initial determination. This second step will only happen after we provide a medical approval and identify what other information we need. This approach strikes a balance between improving the applicant's filing experience and collecting all necessary information to make eligibility determinations. This user-centered approach aligns with Support for Underserved Communities Through the Federal Government, and Executive Order 14058, Transforming Federal Customer Experience and Service Delivery to Rebuild Trust in Government<sup>1</sup>.

For this first phase of the SSI Simplification effort, we are submitting an expansion to the iClaim Internet SSI application (iSSI) to:

- expand the population of individuals who can file for SSI online,
- add basic eligibility questions regarding SSI (i.e., information about their income, resources, and present living situation for one month only); and
- limit the development that technicians need to complete.

The iSSI questions will be part of our current iClaim process under OMB No. 0960-0618. Through use of the new iSSI screens, SSA technicians will no longer contact claimants to obtain the developmental information from Forms SSA-8000 (OMB No. 0960-0229) or SSA-8001 (OMB No. 0960-0444). Instead, upon submission of the online application, technicians will review the responses for completeness and, if the applicant appears to meet basic eligibility requirements, then send the claim to the Disability Determination Services (DDS) for a medical determination. Technicians may contact claimants prior to sending the claim to DDS in situations where they need clarification of the submitted answers from the respondent, or to resolve questions about the eligibility information (e.g., situations where income or resources may seem over the limits; or allegations of work, such as self-employment, which meets the threshold of substantial gainful activity (SGA), etc.). SSA employees may also contact respondents if they identify additional eligibility benefits for which the respondents are eligible under the Retirement, Survivor, Disability Insurance (RSDI) program (e.g., widows, child, etc.).

Although the first phase of the simplification effort is limited to online applications, it is a crucial first step for SSA to expand the streamlined application to the other service channels. For additional, future phases of the SSI simplification effort, we expect to:

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<sup>1</sup> E.O. 14058: [Federal Register :: Transforming Federal Customer Experience and Service Delivery To Rebuild Trust in Government](#)

- Broaden the population of SSI applicants who can use iSSI, and to improve the online service channel based on usability testing,
- Expand implementation of the hybrid approach with the new SSI simplified application across other modalities, and
- Streamline the development process.

We anticipate this multi-phase SSI Simplification project will make the SSI application more accessible to respondents.

## 2. Description of Collection

As part of this effort, our goal is to develop a more user-friendly simplified SSI application and process. As an important step toward that goal, we are currently planning to implement in late 2024 the SSI Simplification Phase I initiative. Phase I will be a pathway in the existing iClaim System that will include the streamlined SSI application (iSSI) for Title XVI disability applicants. iClaim is an online portal the public can use to apply for multiple types of Social Security benefits. Currently, this includes Retirement, Spouse's, and Disability Insurance benefits (DIB). Although SSI Simplification will be part of iClaim, the initiative relates to three existing OMB-approved SSA Information Collection Requests (ICRs). Further details about iSSI and these three related ICRs follow.

### How Will iSSI Work?

The applicant's journey will begin when an individual seeks to apply for Title XVI payments. Our website will inform the applicant of the modalities available to apply for SSI, including online via iClaim. If an applicant chooses to apply online for disability, the iClaim system will walk the respondent through the process as part of the dynamic pathing. Through dynamic pathing, an applicant may also complete the SSI application when applying for DIB by indicating intent to file for SSI.

iSSI will work as follows:

- Title XVI applicants who want to use the Internet to apply for SSI will use the iClaim system to initiate the application process or establish the protective filing date<sup>2</sup> of the application. Applicants filing for themselves can authenticate online using one of our existing authentication methods, while applicants assisting others can use iClaim without authenticating. Although SSA encourages all individuals filing for themselves to authenticate in iClaim, the system will allow all respondents to continue to use iClaim without authentication.
- For applicants who authenticate themselves, the iClaim system can use some information already contained within SSA records to alert technicians and avoid requesting evidence documentation. For all applicants, the iClaim system will

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<sup>2</sup> Sections 20 CFR 404.630 and 20 CFR 416.340-416.345 of the *Code of Federal Regulations* establish SSA's rules and procedures for a protective filing date. A protective filing date is the date by which SSA receives an individual's intent to file for benefits. SSA uses the protective filing date as the claimant's application date provided the individual files an application within a specific amount of time after that date. By using the protective filing date as a claimant's application date, SSA protects the claimant from potentially losing benefits for the period between the expression of intent and the date the application is filed.

prompt the DIB questions and pre-populate the applicant's answers within the iSSI portion of the iClaim pages. The applicants would then only need to answer the new simplified eligibility questions that will form the core of iSSI. These are what SSA refers to as "basic eligibility questions."

- After answering the DIB and SSI basic eligibility questions, applicants will be automatically transferred to other existing steps within the iClaim disability path, such as providing medical information (using the i3368, OMB No. 0960-0579) and, as applicable, signing a medical release using the i827 (OMB No. 0960-0623). This process will be seamless to the applicant, as the iClaim system will take them from page to page without interruption.
- Once the applicant submits the information online, SSA technicians will review it for completeness. If the applicant provided all required medical information, and appears to meet basic eligibility requirements, technicians send the claim to the DDS to make a disability determination. The DDS can make a decision based on the materials and evidence the respondent provides through iClaim; by obtaining medical evidence and/or work history from the applicant (through iClaim), by mail, or by scheduling a consultative examination (if needed).
- We will allow applicants filing for themselves and third-party assistors (i.e., others who assist the applicants) to use the new iSSI process.
  - Note: Although a third party cannot electronically sign on behalf of the applicant, the online process does not require the claimant to visit a field office to provide a signature. Rather, in such cases, the iClaim System automatically mails a copy of the third party's responses to the DIB and SSI application questions to the claimant (i.e., individual who will receive the benefit). The claimant may either sign the application and return it via mail or wait for an SSA employee to call them to give verbal attestation in lieu of a wet signature.

### **To Which Existing SSA ICRs Does iSSI Relate, and How Will It Interact With Them?**

iSSI relates to three existing OMB approved ICRs: (1) 0960-0618, Application for Social Security Benefits (Specifically the Social Insurance Disability (DIB), Form SSA-16); (2) 0960-0229 (SSA-8000, Application for Supplemental Security Income); and (3) 0960-0444 (SSA-8001, Application for Supplemental Security Income (Deferred or Abbreviated)). The SSA-16 is fully electronic through the iClaim system, and Forms SSA-8000 and SSA-8001 are available as either paper forms or Intranet screens that SSA employees can complete while interviewing applicants. Recent discussions with third-party helpers and advocates indicate that they regularly complete and mail the paper SSA-8000 on behalf of applicants. However, that adds an unnecessary burden to respondents, as some information is only needed after a medical approval. SSA data shows that approximately 52% of the SSI applications SSA processed were SSA-8000 applications, while the remaining 48% use the

SSA-8001. The online iSSI streamlined application will make it easier for applicants to file for benefits by paving the way for the future implementation of the streamlined SSI questions on the other service channels (i.e., in person or phone interviews).

iSSI is not eliminating other modalities used to apply for SSI, specifically in-person or telephone interviews conducted by SSA technicians using internal systems, or paper applications completed by third-party respondents. SSA plans to implement changes listed in the Addendum as the first step towards the agency's long-term plan to simplify the current SSI application and internal Systems utilized to intake claims (i.e., electronic versions of the application) such as the Consolidated Claim Experience (CCE) and Intranet SSI Claims System. Future phases include implementing the iSSI questions into in-office and telephone interviews in place of the current CCE or SSI Claims System screens which mirror paper Form SSA-8000, and developing additional evidence after SSA makes a medical allowance. We will also begin working on revising the paper forms to mirror the iSSI questions and process, to allow SSA to make a simplified SSI paper version which can be a self-help form.

The following explains more about each of the iSSI-related OMB-approved ICRs:

1) **0960-0618, Social Security Benefits Applications.** Respondents can submit the Social Security Benefit Applications through the online iClaim system. iClaim offers a streamlined process by prepopulating answers when applicable as the applicant moves seamlessly from one form to another. As well, iClaim uses dynamic pathing, which ensures claimants are only asked to complete the questions that are relevant to them. iClaim currently offers a limited Title XVI application to apply for SSI payments. Applicants navigate the SSA website to learn about benefits for which they can apply online. SSA directs them to iClaim to use the current limited SSI application if they are filing for Title II SSDI and meet the requirements listed below:

- Indicate intent to file for SSI;
- Allege disability and are adults under the age of 64 and 10 months;
- Are U.S. citizens and non-U.S. citizens;
- Have never been married; and
- Have never filed for SSI or been named as a parent on a child's SSI record.

However, the first phase of the new SSI Simplification pathway, as described above, will expand the universe of iClaim respondents to include non-US citizens, and add the streamlined SSI questions to minimize information collected upfront and reduce the need to contact respondents for additional information. The updated iClaim burden figures provided below reflect the inclusion of new SSI claimants who will now be using iSSI to apply.

2) **0960-0229, Application for SSI.** Form SSA-8000 is the full SSI application. SSA instructs technicians to only use the Intranet version of the SSA-8000 for initial claim interviews when respondents:

- Have a condition that would likely meet a medical allowance (*e.g.*, terminal illness, presumptive blindness, compassionate allowance (CAL) conditions such leukemia, Lymphoma, etc.) which allows technicians to simultaneously submit the application for medical evaluation and continue the income and resources development. This process ensures that the medical evaluation is not delayed due to any pending non-medical development; or
- File for aged benefits; or
- File together with a spouse (*i.e.*, couple cases); or
- Meet the Expeditious Handling criteria (*e.g.*, homeless, pre-release from public institutions, etc.).

It is possible that someone who otherwise would have been interviewed by a technician as described above might now complete the new iSSI at the beginning of the process, and, if warranted, be called by SSA at a later point to provide additional required information. This process will continue with the first implementation of this effort. For individuals who indicate intent to file for SSI and are aged (*i.e.*, age of 64 and 10 months or older) or married, iClaim will not display the iSSI pathing; rather, the system will indicate that SSA will contact the applicants later to complete their SSI application.

For the individuals who file for disability and have a condition that would likely meet a medical allowance, the filed application is flagged as a priority case to expedite the process. SSA technicians will quickly review the application, refer it to the DDS for medical evaluation, and simultaneously develop and secure additional information as needed. With the new iSSI, the universe of respondents will expand, but the amount of time needed to complete the application will decrease.

- 3) **0960-0444, Application for Supplemental Security Income (Deferred or Abbreviated)**. SSA instructs technicians to always use this shortened Intranet version of the SSA-8001 SSI application to determine an applicant's potential eligibility, specifically to (1) provide a formal determination when non-medical information the applicant provides results in ineligibility; or (2) defer the complete development of non-medical issues until the DDS approves the medical portion of the disability process.

Specifically, SSA technicians use the SSA-8001 when the filing respondent appears to meet the non-medical eligibility requirements for at least one month and SSA can defer other development until the respondent receives a notice of medical allowance. After the initial interview and upon receiving medical allowance, technicians contact respondents to develop any deferred issues and update the information about income and resources from the time the respondent filed the application up to the month the respondent received SSA's approval. At that point, SSA technicians use the Intranet version of the SSA-8000 to develop the remaining necessary information (SSA anticipates that the majority of respondents for the new iSSI would have been otherwise interviewed by a

technician who would use the electronic version of the SSA-8001).

SSI is a program of last resort. Eligibility, or continued eligibility, under SSI requires applicants or recipients to apply for all other program benefits for which they may be eligible. Therefore, respondents are likely to learn about SSI payments through the following methods:

- referral from other agencies that pay benefits based on need (e.g., unemployment, food stamps, housing, etc.);
- talking to SSA employees when setting up an appointment to file for RSDI benefits, or during the claim interview of a RSDI application in which their benefit is low enough to qualify for SSI;
- receiving SSA mailers, multi-media commercials and advertising as well as SSA's website.

### **Psychological Cost.**

We identified the following psychological costs based on the requirements for this information collection:

- **Requirement for the Program:** The SSI application asks individuals to provide detailed information about their living arrangement, income, and resources so SSA can determine if they meet the non-medical eligibility requirements.
- **Psychological Cost:** Respondents may find the lengthy process of submitting this information stressful as the application has complex questions about income and resources related to months or years. Depending on their responses to the questions, recipients may take longer to complete the application, or they may postpone it, or stop answering the questions entirely. As well, some of the information required may be deemed sensitive, which can be stressful. However, this is necessary to correctly administer the program.

We understand these psychological costs may cause respondents to delay their completion of the information collection or cause them to seek help from others. Therefore, we streamlined the SSI questions for the online application instead of using the identical version of the SSA-8001. Respondents completing either the streamlined online application or the streamlined in-person interview must provide us with the information, sign and submit it. Therefore, we have taken this potential psychological cost into account when calculating our burden in #12 below.

iSSI will be the first step in simplifying the SSI application process for all SSI applicants. Simplifying the SSI application process will save time and be more convenient for all applicants. More specifically, those with access to iSSI who prefer to apply online can avoid a field office visit or a phone appointment. Finally, iSSI will expand online filing options by, for the first time, offering an online SSI

application filing to non-U.S. citizens. Currently, SSA's system informs a non-U.S. citizen trying to file online that they will be contacted by an SSA employee to initiate an application. However, as non-U.S. citizens can now use iClaim, iSSI will also be available for those applicants who are non-U.S. citizens.

Respondents are individuals who are applying for SSI using one of the above-mentioned modalities for the SSI application, or the third parties who aid these individuals in applying for SSI.

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

With the implementation of iSSI, SSA will offer electronic versions of this information collection (specifically, the Intranet-based SSI Claims system and Internet-based iClaim) under the agency's Government Paperwork Elimination Act plan. Based on FY 2023 SSA Management Information (MI) data, approximately 81% of respondents complete the SSI applications through a personal interview process with a technician using either the Intranet CCE or SSI Claims System screens to collect the information for the SSA-8001. In addition, our MI data shows that approximately 16% of the Internet iClaim respondents currently answer "yes" regarding their intent to file for SSI. We anticipate at least a 5% increase in Internet claims through iClaim in FY24, because we are expanding the SSI online respondents through to include non-U.S. citizens effective February 2024. In addition, we anticipate an additional increase in iClaim respondents who will submit the new Internet SSI questions based on the SSA-8001. As we have not implemented the new iSSI questions and process yet, we do not have available MI data regarding this increase. We will make the information available when we have it.

The current paper Forms SSA-8000 and SSA-8001 are complex forms which require help to complete from an SSA or DDS employee, or from an appointed representative who is familiar with the forms. As these are not self-help forms, we do not offer fillable PDF versions to the public to complete them. While we are adding iSSI screens as an alternate modality for the paper SSA-8001, we do not currently have an electronic modality for the SSA-8000 (other than the personal interview process using the SSI Claim Systems screens). However, we are adding the SSA-8000 to our Upload Documents Portal (OMB No. 0960-0830), which will allow appointed representatives to submit the completed paper forms to SSA electronically instead of mailing the paper form or visiting a local office.

### **4. Why We Cannot Use Duplicate Information**

When we require a full SSI application (SSA-8000, OMB No. 0960-0229) after taking a deferred SSI application (SSA-8001, OMB No. 0960-0444), technicians change the system entry from deferred to full. We store the responses the applicant already provided while the system makes the additional questions for a full SSI application available to complete. This system functionality avoids collecting duplicate information. For iSSI Internet applications, we leverage common questions from the Disability Application (OMB No. 0960-0618) for the SSI application to avoid duplication.



We may also need to collect some of the information we collect with the SSI application along with other Title II, Title XVIII applications, or with the recording of a protective filing using the Enhanced Leads and Applications System (eLAS) or Internet appointment (iAppointment) Systems (OMB No. 0960-0822). We are able to reduce the collection of redundant information by using the personal proven data (e.g., date of birth, citizenship, contact information, earnings) among SSA's various claims systems when needed. When using a system application such as the Intranet based SSI Claims system or the Internet Claim (iClaim) system, any personal data previously collected propagates into the claims path for the technician to verify with the claimant and update when necessary. This reduces the burden on the respondent, as they do not need to submit the information to SSA more than once.

**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 collect the SSI simplified information based on Form SSA-8001, technicians would need to use Form SSA-8000 to collect this information. However, doing so increases the claim interviewing time and burden to the public since the SSA-8000 includes developmental questions for determining eligibility and payment amount. Therefore, we try to only collect the required information when necessary. This is evident in our first phase of the iSSI Simplification Process. We will also be applying the simplification to other modalities, such as in-office and telephone interviews and paper applications in future phases. Because we only collect the information once, we cannot collect it less frequently.

**7. Special Circumstances**

There are no special circumstances that would cause SSA to conduct this information collection 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 (FRN) published on August 9, 2023, at 88 FR 53945, and we received 64 public comments. We addressed these public comments in the attached Addendum to the Supporting Statement.

The 30-day FRN published on August 27, 2024, at 89 FR 68691. If we receive any comments in response to this Notice, we will forward them to OMB.

In response to concerns from respondents and members of Congress about the length and complexity of the SSI paper application, SSA met with advocacy representatives to learn about the issues they were experiencing when assisting claimants. Based on those discussions, SSA conducted exploratory evaluations to simplify the questions and provide an online SSI application. We tested preliminary drafts of the new simplified questions with a small group of individuals for readability and understanding purposes. SSA utilized those findings to create the SSI screens in

iClaim and share them with a group of advocates. Overall, the advocates' feedback was positive, however, they had some reservations regarding the content of the iSSI questions and they provided some language recommendations, which SSA adopted. Advocates also expressed concerns regarding the ability of the applicants to respond to some of the questions, as well as some confusion over why we chose to only ask the basic eligibility questions. We discuss these in the Addendum to the Supporting Statement.

**9. Payment or Gifts to Respondents**

SSA does not provide payments 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 updated iClaim burden figures provided below reflect the inclusion of new SSI claimants who will now be using iSSI to apply.

The updated estimates for the public reporting burden under **0960-0618 (Social Security Benefits Applications)** are as follows:

**SSA-1**

<b>Modality of Completion</b>	<b>Number of Respondents</b>	<b>Frequency of Response</b>	<b>Average Burden Per Response (minutes)</b>	<b>Estimated Annual Burden (hours)</b>	<b>Average Theoretical Cost Amount (dollars)*</b>	<b>Average Wait Time in Field Office or for Teleservice Centers (minutes)**</b>	<b>Total Annual Opportunity Cost (dollars)***</b>
Paper version (SSA-1)	17,604	1	11	3,227	\$31.48*		\$101,586***
Interview / Phone MCS	1,679,321	1	10	279,887	\$31.48*	19**	\$25,551,435***
Interview / Office MCS	51,648	1	10	8,608	\$31.48*	24**	\$921,325***
Internet First Party	1,835,958	1	15	458,990	\$31.48*		\$14,449,005***
Third party initiated (complete and	81,810	1	15	20,453	\$31.48*		\$643,860***

submit)							
<b>Totals</b>	<b>3,666,341</b>			<b>771,165</b>			<b>\$41,067,211***</b>

**SSA-2**

<b>Modality of Completion</b>	<b>Number of Respondents</b>	<b>Frequency of Response</b>	<b>Average Burden Per Response (minutes)</b>	<b>Estimated Annual Burden (hours)</b>	<b>Average Theoretical Cost Amount (dollars)*</b>	<b>Average Wait Time in Field Office or for Teleservice Centers (minutes)**</b>	<b>Total Annual Opportunity Cost (dollars)***</b>
Paper version (SSA-2)	6,723	1	15	1,681	\$31.48*		\$52,918***
Interview / Phone MCS	358,225	1	14	83,586	\$31.48*	19**	\$6,202,316***
Interview/ Office MCS	8,227	1	14	1,920	\$31.48*	24**	\$164,042***
Internet First Party	119,129	1	15	29,782	\$31.48*		\$937,537***
<b>Totals</b>	<b>492,304</b>			<b>116,969</b>			<b>\$7,356,813***</b>

**SSA-16**

<b>Modality of Completion</b>	<b>Number of Respondents</b>	<b>Frequency of Response</b>	<b>Average Burden Per Response (minutes)</b>	<b>Estimated Annual Burden (hours)</b>	<b>Average Theoretical Cost Amount (dollars)*</b>	<b>Average Wait Time in Field Office or for Teleservice Centers (minutes)**</b>	<b>Total Annual Opportunity Cost (dollars)***</b>
Paper version (SSA-16)	46,032	1	20	15,344	\$31.48*		\$483,029***
Interview / Phone MCS	723,281	1	19	229,039	\$31.48*	19**	\$14,420,295***
Interview / Office MCS	10,843	1	19	3,434	\$31.48*	24**	\$244,631***
Internet First Party	667,806	1	15	166,952	\$31.48*		\$5,255,649***
Internet Third party	561,014	1	15	140,254	\$31.48*		\$4,415,196***
<b>Totals</b>	<b>2,008,976</b>			<b>555,023</b>			<b>\$24,818,800***</b>

**Grand Total**

<b>Modality of Completion</b>	<b>Number of Respondents</b>	<b>Frequency of Response</b>	<b>Average Burden Per Response (minutes)</b>	<b>Estimated Annual Burden (hours)</b>	<b>Average Theoretical Cost Amount (dollars)*</b>	<b>Average Wait Time in Field Office or for Teleservice Centers (minutes)**</b>	<b>Total Annual Opportunity Cost (dollars)***</b>
<b>Totals</b>	<b>6,167,621</b>			<b>1,443,157</b>			<b>\$73,242,824***</b>

\* We based this figure on the average hourly wage for all occupations as reported by the U.S. Bureau of Labor Statistics ([https://www.bls.gov/oes/current/oes\\_nat.htm](https://www.bls.gov/oes/current/oes_nat.htm)).

\*\* We based this figure on the average FY 2024 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 updated estimates for the public reporting burden under **0960-0229 (the full-length SSI application, SSA-8000)** are as follows:

<b>Modality of Completion</b>	<b>Number of Respondents</b>	<b>Frequency of Response</b>	<b>Average Burden Per Response (minutes)</b>	<b>Estimated Total Annual Burden (hours)</b>	<b>Average Theoretical Cost Amount (dollars)*</b>	<b>Average Wait Time in Field Office or for Teleservice Centers (minutes)**</b>	<b>Total Annual Opportunity Cost (dollars)***</b>
Intranet CCE or SSI Claims System	674,154	1	35	393,257	\$22.39*	19**	\$13,584,886***
SSA-8000 (Paper Version)	34,244	1	40	22,829	\$22.39*	19**	\$753,938***
Internet SSI (iSSI) converted into CCE intranet full application	1,080	1	20	360	\$22.39*	19**	\$15,718***

<b>Total</b>	<b>709,478</b>			<b>416,446</b>			<b>\$14,354,542***</b>
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\* We based this figure by averaging both the average DI payments based on SSA's current data (<https://www.ssa.gov/legislation/2024FactSheet.pdf>), and the average U.S. worker's hourly wages, as reported by Bureau of Labor Statistics data ([https://www.bls.gov/oes/current/oes\\_nat.htm](https://www.bls.gov/oes/current/oes_nat.htm)).

\*\* We based this figure on averaging both the average FY 2024 wait times for field offices and teleservice centers, based on SSA's 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 updated estimates for the public reporting burden under **0960-0444 (the Abbreviated SSI application, SSA-8001)** are as follows:

<b>Modality of Completion</b>	<b>Number of Respondents</b>	<b>Frequency of Response</b>	<b>Average Burden Per Response (minutes)</b>	<b>Estimated Total Annual Burden (hours)</b>	<b>Average Theoretical Cost Amount (dollars)*</b>	<b>Average Wait Time in Field Office or for Teleservice Centers (minutes)**</b>	<b>Total Annual Opportunity Cost (dollars) ***</b>
Intranet CCE or SSI Claims System	426,388	1	28	198,981	\$22.39*	19 **	\$7,478,350* **
Internet Claim System (iSSI) First party	76,500 <sup>+</sup>	1	6	7,650	\$22.39*		\$171,284***
Internet Claim System (iSSI) Third party	71,000 <sup>+</sup>	1	6	7,100	\$22.39*		\$158,969***
SSA-8001	38,304	1	28	17,875	\$22.39*	19**	\$671,812***

(Paper Version)							
<b>Total</b>	<b>612,192</b>			<b>231,606</b>			<b>\$8,480,415*</b> <b>**</b>

+ We are not double counting the number of respondents in this ICR, as we do not account for the iSSI (iClaim) respondents under 0960-0618, we only account for them here.

\* We based this figure by averaging both the average DI payments based on SSA's current data (<https://www.ssa.gov/legislation/2024FactSheet.pdf>), and the average U.S. worker's hourly wages, as reported by Bureau of Labor Statistics data ([https://www.bls.gov/oes/current/oes\\_nat.htm](https://www.bls.gov/oes/current/oes_nat.htm)).

\*\* We based this figure on averaging both the average FY 2024 wait times for field offices and teleservice centers, based on SSA's 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.**

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 calculations of the time burden for this collection. OIRA based their estimation on a 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:

<b>Total Number of Respondents Who Visit a Field Office</b>	<b>Frequency of Response</b>	<b>Average One-Way Travel Time to a Field Office (minutes)</b>	<b>Estimated Total Travel Time to a Field Office (hours)</b>	<b>Total Annual Opportunity Cost for Travel Time (dollars)*****</b>
4,005,715*** *	1	30	2,002,858	\$44,843,991*****

\*\*\*\* Per Operational reports, approximately 1% of interviews that include an application for SSI based on blindness or disability are in-office.

\*\*\*\*\* 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.

We calculated the following Learning Cost time burden based on the estimated time and effort we expect respondents will take to learn about this program, its applicability to their circumstances, and to cover any additional research we believe respondents may need to take to understand how to comply with the program requirements (beyond reading the instructions on the collection instrument):

<b>Total Number of Respondents</b>	<b>Frequency of Response</b>	<b>Estimate Learning Cost (minutes)</b>	<b>Estimated Total Annual Burden (hours)</b>	<b>Total Annual Learning Cost (dollars)*****</b>
7,489,291	1	9	1,123,394	\$25,152,792*****

\*\*\*\*\* We based this dollar amount on the Average Theoretical Hourly Cost Amount in dollars shown on the burden chart above.

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.

We base our burden estimates on current management information data, which includes data from actual interviews, as well as from years of conducting this information collection. Per our management information data, we believe that the burdens per response for each form shown on the chart above accurately show the average burden per response for learning about the program; receiving notices as needed; reading and understanding instructions; gathering the data and documents needed; answering the questions and completing the information collection instrument; scheduling any necessary appointment or required phone call; consulting with any third parties when authorized; and waiting to speak with SSA employees

(as needed). Based on our current management information data, the current burden information we provided is accurate. The total burden for this combined ICR is **2,091,209** burden hours (reflecting SSA management information data), which results in an associated theoretical (not actual) opportunity cost financial burden of **\$166,074,564**. SSA does not charge respondents to complete our applications.

**13. Annual Cost to the Respondents (Other)**

This collection does not impose a known cost burden on the respondents.

**14. Annual Cost to Federal Government**

The annual cost to the Federal Government is approximately **\$16,208,042**. This estimate accounts for costs from the following areas:

<b>Description of Cost Factor</b>	<b>Methodology for Estimating Cost</b>	<b>Cost in Dollars*</b>
Designing and Printing the Form	Design Cost + Printing Cost	\$11,622
Distributing, Shipping, and Material Costs for the Form	Distribution + Shipping + Material Cost	\$0*
SSA Employee (e.g., field office, 800 number, DDS staff) Information Collection and Processing Time	GS-9 employee x # of responses x processing time	\$9,628,628
Full-Time Equivalent Costs	Out of pocket costs + Other expenses for providing this service	\$0*
Systems Development, Updating, and Maintenance	GS-9 employee x man hours for development, updating, maintenance	\$5,589,987**
Quantifiable IT Costs	Any additional IT costs	\$0*
Other	Usability testing and screen design	\$977,805
<b>Total</b>		<b>\$16,208,042</b>

\* We have inserted a \$0 amount for cost factors that do not apply to this collection.

\*\*We are reporting \$5,589,987 with this ICR since it represents costs specific to adding the SSI questions to SSI’s Internet claim and updating the SSI Claim system to accept the SSI internet claim. We will continue to report the ongoing updates and maintenance under OMB No. 0960-0229.

SSA is unable to break down the costs to the Federal government further than we already have. First, since we work with almost every US citizen, we often do bulk mailings, and cannot track the cost for a single mailing. In addition, it is difficult for us to break down the cost for processing a single form, as field office and State



Disability Determination Services staff often help respondents fill out several forms at once, and the time it takes to do so can vary greatly per respondent. As well, because so many employees have a hand in each aspect of our forms, we use an estimated average hourly wage, based on the wage of our average field office employee (GS-9) for these calculations. However, we have calculated these costs as accurately as possible based on the information we collect for creating, updating, and maintaining these information collections.

#### **15. Program Changes or Adjustments to the Information Collection Request**

We expect this new Information Collection to decrease the overall public reporting burden for the SSA-8001 and SSA-8000 information collections. Under our current collections for 0960-0229 and 0960-0444, we estimate a total burden for all SSI applications of 1,281,765; however, utilizing the new iSSI screens, we expect the total burden to decrease to 648,052. In addition, we also note a decrease in the total burden for 0960-0618 from 3,027,018 to 1,443,157, which reflects an overall decrease in use of the paper applications as shown in our current MI data, as well as an increase in the use of iClaim and decrease in the use of the paper or personal interview processes. Therefore, we expect a total overall decrease from the current 4,308,783 burden hours to 2,091,209. See #12 above for updated burden figures.

As noted in #12 above, upon OMB approval of this Information Collection, we will update the burden figures in the associated information collections under 0960-0229 and 0960-0444, to reflect these revised burdens. We will also update 0960-0618 to include the new iSSI screens for iClaim.

\* Note: The total burden reflected in ROCIS is 5,079,450, while the burden cited in #12 of the Supporting Statement is 2,091,209. This discrepancy is because the ROCIS burden reflects the following components: field office waiting time + a rough estimate of a 30-minute, one-way, drive burden + learning costs. In contrast, the chart in #12 of the Supporting Statement reflects actual burden.

#### **16. Plans for Publication Information Collection Results**

SSA will not publish the results of the information collection.

#### **17. Displaying the OMB Approval Expiration Date**

For the Paper versions of the above discussed information collections, 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.

For the Intranet versions of these information collections, 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.