

Supporting Statement for Form SSA-454-BK
Continuing Disability Review Report
20 CFR 404.1589 & 416.989
OMB No. 0960-0072

A. Justification

1. Introduction/Authoring Laws and Regulations

Sections 205(a) and 1631(e)(1)(A) of the *Social Security Act* (*Act*) provide the Commissioner of the Social Security Administration (SSA) with the authority to make rules and regulations, establish procedures, and adopt reasonable and proper procedures governing the nature and extent of the evidence (as well as the methods of taking and furnishing the same) to determine whether an individual continues to be disabled. Sections 223(d)(5)(A) and 1614(a)(3)(H)(i) of the *Act*, as amended, provide that claimants furnish such medical and other evidence the Commissioner requires to prove they continue to be disabled. Sections 221(i), 1614(a)(3)(H)(ii)(I) and 1633 (c)(1) of the *Act* require SSA to periodically review the cases of individuals who receive benefits under Title II or Title XVI of the *Act* based on disability, to determine if disability continues. As provided in 20 CFR 404.1589 and 20 CFR 416.989 of the *Code of Federal Regulations*, SSA may conduct a review to determine whether benefit entitlement or eligibility continues for individuals receiving disability benefits. This clearance request is a simple renewal with minimal changes to an existing collection. This request contains updated estimates based on internal Management Information data, updates to the Privacy Act Statement, and updated language in the Other Medical Information section for additional clarity.

2. Description of Collection

SSA considers adults eligible for disability payments if they continue to be unable to do substantial gainful activity because of their impairments, and we consider Title XVI children eligible for disability payment if they have marked and severe functional limitations because of their impairments. SSA has a statutory requirement to conduct periodic reviews to determine if an individual continues to be disabled. To assess claimants' ongoing disability payment eligibility, SSA uses the information gathered through a form, the Continuing Disability Review Report, to complete a mandatory review for the continuing disability review (CDR). A review is conducted at different intervals depending on the individual's impairments, at least once every three years for nonpermanent impairments and no less frequently than once every seven years but more frequently than once every five years. SSA also uses the Continuing Disability Review Report to obtain information on sources of medical treatment; participation in vocational rehabilitation programs (if any); attempts to work (if any); and recipients' assessments when they believe their conditions improved.

The respondents are Title II or Title XVI disability recipients or their representatives. Title II or Title XVI disability recipients can complete the

Continuing Disability Review Report using one of five modalities: (1) the paper Form SSA 454-BK, which the respondent mails back to SSA in a pre-postage paid envelope; (2) the paper Form SSA-454-BK, which the respondent returns to a local field office; (3) the fillable PDF SSA-454-BK, which respondents complete and submit via our Upload Documents portal (OMB No. 0960-0830); (4) the Internet i454, which respondents complete and submit electronically through the mySocial Security account link; or (5) a face-to-face (or teleclaim) interview with a claims specialist through an SSA field office during which SSA technicians enter claimant's data directly into the Electronic Disability Collection System (EDCS). When SSA initiates a medical CDR, SSA sends a mailed notice to the individual with a disability informing that individual that SSA requires a CDR. The mailed notice provides instructions to the recipient on how to assist the agency with initiating the CDR and gives the individual the option to complete a paper SSA-454 or an i454 for adult only disabled individuals. When an individual requires a CDR, a claims specialist (CS) mails the paper Form SSA-454-BK, and the respondent completes the form and sends or brings it back to SSA; or the CS interviews the respondent during a teleclaim and enters the information into the appropriate EDCS screens; or adult disabled individuals can complete the SSA-454-BK electronically using the i454 Internet application. The agency has made this mandatory information collection easier by offering the different modalities mentioned above for obtaining necessary information; with the option to complete the paper Form SSA 454-BK and mailing it back to SSA in a pre-postage paid envelope, returning the paper form to a local office, completing the fillable PDF SSA-454-BK at home via Upload Documents, completing the internet i454 at home, or scheduling a face-to-face interview (or teleclaim) with a CS through an SSA field office. The SSA-454-BK also provides helpful examples where appropriate to assist the respondent in providing answers. Regardless of the modality the respondent uses to complete the information (paper, EDCS, or Internet versions), SSA electronically stores the information provided in EDCS. The respondents complete the SSA-454-BK by themselves with self-help information available, or a representative may complete the paper form or electronic application on their behalf. The respondents generally do not need information from someone else to complete the form. In some circumstances, the respondent may need extra assistance in completing the form. The SSA-454-BK provides instructions on obtaining help, providing a telephone number to call or a discussion of information collected during a scheduled continuing disability review interview. The form also explains that SSA will provide an interpreter free of charge if the respondent is unable to speak or understand English.

The following is a list and description of each modality SSA uses to collect information for these benefit applications:

Paper Application Form:

Title II and Title XVI recipients, or their representatives, can complete the paper SSA-454-BK, or they can download and complete the fillable PDF version of the

form from our website or access it via the Upload Documents tool. In either case, the respondents using the paper or fillable PDF version complete the form and submit it to SSA either via USPS mail, by bringing the completed form to an SSA field office, or by submitting it through the Upload Documents portal. Once SSA receives the paper SSA-454-BK and any supplemental information, if necessary, we process the information and store it in EDCS.

SSA no longer prints and delivers paper copies of these forms to field offices since printable and fillable versions are available on our website; however, local field offices often print the form in office to send to respondents.

Interview/EDCS Screens:

EDCS mirrors the paper SSA-454-BK using an electronic collection method. Guided by the EDCS collection screens, the CS interviews the applicant either by phone or in-person and inputs the information directly into EDCS. EDCS propagates information to other screens in the application, then prints an application summary for the claimant to review and sign either by attestation or wet signature. In contrast to the paper application, the interview/EDCS process offers the following advantages: (1) it improves accuracy in recording responses; (2) it reduces the overall interview time; and (3) it reduces the number of times we have to re-contact applicants to clarify responses.

Internet i454 Application:

The i454 is an online platform that mirrors the EDCS format. At this time, only individual adult claimants, or their representatives, can use the i454 to complete a medical Continuing Disability Review Report. Depending on their initial answers, the i454 presents respondents with different screens, ensuring they only respond to relevant questions. After completing the online application, claimants or their representatives can submit it electronically to SSA, avoiding the need to visit an SSA office. The i454 is more convenient for users and reduces their application completion time by eliminating the need for an office visit. This also saves time and resources for SSA. Respondents using the i454 may have to submit supplementary supporting documents (e.g., medical evidence) to finalize the application. Once SSA receives the i454 and any supplemental information, if necessary, we process the information and store it in EDCS.

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

- **Psychological Cost #1:**
 - **Requirement for the Program:** The SSA-454-BK requests information SSA already has on file as part of our Continuing Disability Review (CDR) requirements.
 - **Psychological Cost:** Respondents report that they find the entire process stressful to the point that it may take them longer to

complete the CDR process, or they may postpone it, or abandon form completion entirely.

- **Psychological Cost #2:**
 - **Requirement for the Program:** The SSA-454-BK asks individuals for sensitive information, such as personal identifiable information and medical information to gather necessary information to accurately process their Continuing Disability Review.
 - **Psychological Cost:** Respondents might feel stress when providing answers to personal and sensitive questions. This may cause some respondents to take longer to complete the form, postpone form completion, or stop answering questions entirely.

We understand these psychological costs may cause respondents to delay their completion of the information collection or cause them to abandon the information collection entirely. However, we require full completion of this collection to process the continuing disability review. Therefore, we have taken these potential psychological costs into account when calculating our burden in #12 below.

The respondents are Title II or Title XVI disability recipients or their representatives.

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

Under the agency's Government Paperwork Elimination Act plan, SSA created two electronic versions of the Form SSA-454-BK: the EDCS interview screens, and the i454 Internet application (which only disabled adult individuals, or their representatives may use at this time). Based on our data, we estimate approximately 50% of respondents under this OMB number use the electronic versions. SSA designed the electronic modalities to collect the same information as the paper form; however, we formatted it differently for the requirements of each modality to include certain enhancements (e.g., instructions and help screens) to guide the interviewer or applicant through the application process.

- **EDCS SSA-454:**

Applicants call or visit an SSA field office to provide the information to a CS during an in-person interview (or teleclaim). The CS interviews the claimant and enters the answers directly into the EDCS version of the SSA-454-BK. Approximately 47% of respondents use this option.
- **Internet 454 (i454):**

The i454 is a fully electronic, Internet application version of Form SSA-454-BK. Individual adults undergoing a medical continuing disability review, or their representatives, may access, complete, and

submit the i454 electronically through the internet-based application. SSA designed the i454 to walk first-time users through the information collection. It contains numerous help screens and explanations regarding why we ask certain questions on the form. Based on updated management information data, about 8% of respondents use this option.

Note: This data is subject to change in future renewals as we collect more management information data on the use of this modality implemented within the last three years.

SSA created a fillable PDF version of this form for respondents to download, complete, print, and submit to SSA. We do not require a signature on this form. In addition, as mentioned above, we offer two electronic modalities for respondents to use to submit this information to SSA: one which allows submission via Upload Documents through a “my Social Security” account, or by mail or via an in-office interview, if completed with the local office; and one which allows for an electronic agreement via Internet submission. The i454 is currently the only fully public-facing Internet version that is electronic and submittable online.

4. Why We Cannot Use Duplicate Information

The nature of the information we collect and the manner in which we collect it preclude duplication. We collect some similar information on the SSA-455, Disability Update Report (OMB No. 0960-0511); however, collecting the information on the SSA-454-BK is mandatory to complete the CDR, and we do not require respondents to complete both the SSA-455 and the SSA-454-BK in the same year.

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 information on the Continuing Disability Review Report (using any of the modalities mentioned in #2 above), we would be unable to make a timely determination regarding if and when recipients should stop receiving disability payments (either because adults are able to work, or Title XVI children no longer have marked and severe functional limitations). Because we collect the information on an as needed basis, we cannot collect it less frequently. There are no technical or legal obstacles to burden reduction.

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 published on July 21, 2025, at 90 FR

34327, and we received public comments from a total of 5 commenters. Please see the Addendum for the summary of the public comments and SSA's responses.

The 30-day FRN published on December 17, 2025, at 90 FR 58678. If we receive any comments in response to this Notice, we will forward them to OMB. We did not consult with the public in the revision of this form. We did not consult with the public in the revision/maintenance of this form.

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.

As mentioned in #2 above, we understand that there are psychological costs associated with this information collection. SSA has received public comments in the past remarking on CDR information collections, including comments that members of the public feel we already have information on file and should not be asking for additional information and they feel the CDR process is stressful and may dissuade respondents from providing responses to questions. We understand these psychological costs may cause respondents to delay their completion of the information collection or cause them to abandon the information collection entirely. However, we require full completion of this collection to [continue to] receive benefits and have taken this potential psychological cost into account when calculating our burden in #12 below.

12. Estimates of Public Reporting Burden

Modality of Completion	Number of Respondents	Frequency of Response	Average Burden per Response (minutes)	Estimated Total Annual Burden (hours)	Average Theoretical Hourly Cost Amount (dollars)**	Average Wait Time in Field Office (minutes)***	Total Annual Opportunity Cost (dollars)****
SSA-454-BK (paper version)	249,194	1	600*	2,491,940	\$14.27**	17***	\$36,567,517****
Electronic Disability Collect	267,975	1	600*	2,679,750	\$14.27**	50***	\$41,426,709****

System (EDCS)							
i454 (Internet)	45,763	1	600*	457,630	\$14.27**		\$6,530,380****
Totals	562,932			5,629,320			\$84,524,606****

* The estimated time of 600 minutes to complete Form SSA-454-BK is an average for the respondents, who are Title II or Title XVI disability recipients or their representatives. Some of these respondents may take longer to complete the form or alternate modality and submit the information, while others will complete the form or alternate modality faster, which is why we use average time estimates to calculate time burdens for these information collections. These estimates were originally developed and are still based on, our current management information data, and feedback from the public.

** We based this figure on the average DI payments based on SSA's current FY 2026 data ([Effect of COLA on Average Social Security Benefits](#)).

*** We based this figure on the average combined FY 2026 wait times for field offices (16 minutes) and for teleservice centers (47 minutes which includes the average speed of answer of 6 minutes as well as the average 41 minute wait time for a call back from an SSA technician), based on SSA's current management information data. This figure reflects both data from our systems and the data posted on our public facing website (800 number performance | SSA) on the date we drafted this notice. As the figures fluctuate daily, the wait times may be different on the publication date of the federal register notice.

**** 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:

Total Number of Respondents Who Visit a Field Office	Frequency of Response	Average One-Way Travel Time to a Field Office (minutes)	Estimated Total Travel Time to a Field Office (hours)	Total Annual Opportunity Cost for Travel Time (dollars)****

134,977	1	30	67,489	\$963,068*****
---------	---	----	--------	----------------

*****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.

Learning Cost

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):

Total Number of Respondents	Frequency of Response	Estimate Learning Cost (minutes)	Estimated Total Annual Burden (hours)	Total Annual Learning Cost (dollars)**
562,932	1	5	46,911	\$669,420*****

*****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 600 minutes accurately shows 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 (as needed); and waiting to speak with SSA employees (as needed). This figure does not account for specific time keying in entries or responses, rather, the amount of time the form is initiated until it is submitted. As such, we believe this likely represents an overestimate of the amount of time to fill out the form. Based on our current management information data, the current burden information we provided is accurate. The total burden for this ICR is 5,629,320 burden hours (reflecting SSA management information data), which results in an associated theoretical (not actual) opportunity cost financial burden of \$86,157,094. 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 **\$14,205,101**. This estimate accounts for costs from the following areas:

Description of Cost Factor	Methodology for Estimating Cost	Cost in Dollars*
Designing and Printing the Form	Design Cost (\$4,874.45) + Printing Cost (\$3,436.61)	\$8,311
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-11 employee x # of responses x processing time	\$12,775,742
Full-Time Equivalent Costs	Out of pocket costs + Other expenses for providing this service	\$0*
Systems Development, Updating, and Maintenance	GS-12 employee x man hours for development, updating, maintenance	\$1,421,048
Quantifiable IT Costs	Any additional IT costs	\$0*
Total		\$14,205,101

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

SSA is unable to break down the costs to the Federal government further than we

already have. First, 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 a GS-11 and GS-12 FO employee 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

When we last cleared this IC in 2023, the burden was 480 minutes. We are currently reporting a burden of 600 minutes. This burden estimate increased based on our internal management data and response to public comments. We included an additional explanation of the increased time burden in item #12 above.

*** Note:** The total burden reflected in ROCIS shows the additional totals for the field office and telephone call system wait times (for those ICs that require them) as well as the rough estimate of a 30-minute, one-way, drive time in our calculation of the time burden (for half of the teleclaim interviews which are done in office rather than via telephone), and a 30-minute learning cost. As a note, SSA has decreased the wait times for field office and telephone calls since 2023, which is reflected in these figures. This is why the burden estimates on ROCIS do not match the chart in #12 above.

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 form SSA-454-BK, we will not publish the OMB approval expiration date. 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 **Internet and EDCS versions** of Form SSA-454-BK, 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.