

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

Background

Respondents use Form SSA-454-BK to complete a mandatory review for the continuing disability review (CDR) when SSA identifies them as needing an updated assessment of their disability status. Currently, Title II or Title XVI disability recipients can complete the Continuing Disability Review Report using one of using one of three modalities: 1) a paper application or fillable PDF (using Form SSA-454-BK) via the SSA website or Upload Documents tool; 2) a field office interview, during which SSA employees enter claimant's data directly into the Electronic Disability Collection System (EDCS); or 3) using an online system (i454).

Revisions to the Information Collection

SSA is making the following non-substantive change to the paper (and EDCS) SSA-454 and the i454:

- **Change #1:** We revised the language in the Privacy Act Statement after the **“WHAT YOU NEED TO COMPLETE THIS REPORT”** section. The language was updated for consistency with current standardized language.

Justification #1: The agency has updated the Privacy Act Statement to a shorter, streamlined version than the prior statement.

SSA is making the following non-substantive change to the paper SSA-454:

- **Change #1:** We revised the following information in the **“Other Medical Information”** section:

 “Within the last 12 months, does anyone else (other than your medical providers) have your medical information or are you scheduled to see anyone else? Examples include places like social services agencies, case workers, welfare agencies, attorneys, prisons, workers’ compensation, insurance companies who have paid you disability benefits.

Revised to:

“Within the last 12 months, does anyone else (other than your medical providers) have medical information about your physical or mental health conditions or are you scheduled to see anyone else? Examples include places like social services agencies, case workers, welfare agencies, attorneys, prisons, workers’ compensation, or insurance companies who have paid you disability benefits.”

- **Justification #1:** We revised the format for enhanced readability and clarity.

SSA is making the following non-substantive change to the EDCS SSA-454:

- **Change #1:** We revised the following information in the “Other Medical Information” section:

“Does anyone have medical information about your physical or mental condition(s) (including emotional and learning problems) covering the last 12 months, or are you scheduled to see anyone else?”

Examples:

- Workers’ compensation
- Insurance companies who have paid you disability benefits
- Prisons
- Attorneys
- Welfare or social service agency

Revised to:

“**Within the last 12 months**, does anyone else (other than your medical providers) have medical information about your physical or mental health conditions or are you scheduled to see anyone else? Examples include places like social services agencies, case workers, welfare agencies, attorneys, prisons, workers’ compensation, or insurance companies who have paid you disability benefits.”

- **Justification #1:** We revised the format for enhanced readability and clarity. The updates are consistent with edits to the paper SSA-454 and the i454.

SSA is making the following non-substantive changes to the i454:

- **Change #1:** We removed the sentence “Please complete as much of the report as you can” in the “Instructions” page.

Justification #1: This instruction is applicable to the paper SSA-454 but not the internet i454 version because the user must complete all required questions in order to submit their application. Therefore, we removed this instruction from the i454.

- **Change #2:** We revised the following information in the “Other Medical Information” section:

“Does anyone else (other than your medical providers) have medical information about your physical or mental health conditions? Include organizations you have seen in the last 12 months of have future appointments with.

Examples includes places like social services agencies, welfare agencies, case workers, attorneys, prisons, workers' compensation, or insurance companies who have paid you disability benefits. “

Revised to:

“**Within the last 12 months**, does anyone else (other than your medical providers) have medical information about your physical or mental health conditions or are you scheduled to see anyone else?”

Examples include places like:

- Social services agencies
- Case workers
- Welfare agencies
- Attorneys
- Prisons
- Workers' compensation, or
- Insurance companies who have paid you disability benefits”

Justification #2: We revised the format for enhanced readability and clarity. The updates are consistent with edits to the paper (and EDCS) SSA-454.

- **Change #3:** We revised the maximum character count on the “Remarks” page in the “Additional Information” section from 6000 characters maximum to 5500 characters maximum.

Justification #3: The text in this section has been updated to reflect accurate character counts for entry in the i454.

SSA will make these revisions upon OMB's approval. These revisions to the information collections will not affect the public reporting burden for this information collection.

Terms of Clearance

OMB placed the following Terms of Clearance on this Information Collection when they last approved it on 1/17/23:

Term #1: No later than two weeks after conclusion, the agency will conduct a non-substantive change to update the addendum, iCDR instrument, SSA-454 instrument, and the Supporting Statement to reflect agreed-upon changes between the agency and OMB as appropriate. Updates in this non-substantive change should include all revisions to verbiage on the SSA-454 and iCDR that will be implemented in the go-live versions of the form and web-page, which includes changes SSA agreed upon in passback materials

as well as indicating, to the extent possible, that Activities of Daily Living Questions "A" ("Typical day") and "B" ("Hobbies and Interests") are optional for respondents. In the addendum, the agency should make revisions to any responses to public comment that warrant update based on the agreed-upon changes to the instruments. In the addendum, the agency should revise the "Revisions to the Information Collection" section to describe all agreed-upon revisions to the instruments by May 31, 2023, including removing the "Activities Daily Living" questions. If necessary, the agency should make revisions to the Supporting Statement.

SSA Response #1: As per OMB's request, SSA submitted the required Change Request showing these above-requested revisions on 1/30/23. OMB approved the Change Request on 2/10/23.

Term #2: No later than May 31, 2023, the agency will conduct a second non-substantive change to complete further revisions to this ICR as agreed-upon by the agency and OMB during this review. This revision will include removing the Activities of Daily Living Questions "A" ("Typical day") and "B" ("Hobbies and Interests") as well as minor changes to instructions and verbiage as already agreed-upon between the agency and OMB. The agency may also make additional changes to verbiage and instructions contingent on agreement related to outstanding items of discussion.

SSA Response #2: As per OMB's request, SSA submitted the required Change Request showing these above-requested revisions on 5/1/23. OMB approved the Change Request on 5/2/23.

Term #3: The agency will continue to engage with OMB regarding their rollout plan to governmental and external stakeholders.

SSA Response #3: At this time, we are not planning any significant changes to the SSA-454-BK or i454. We are only making the minor revisions we listed above. We will continue to engage with OMB when we are ready to discuss any further revisions to the CDR process, the SSA-454-BK, or the i454, and any rollout plans for future revisions.

Public Comments on the Information Collection

60-Day Comment Period Federal Register Notice (FRN):

The 60-day Comment Period began on July 21, 2025, and ended on September 19, 2025, at 11:59pm. We received public comments on the 60-Day Comment Period FRN from a total of 5 commenters. Of those, we received and posted 5 comments (which each consisted of the multiple points delineated below), and we did not post 1 duplicate comment. We acknowledge and appreciate the thoughtful feedback from the commenters, and we responded to their comments below:

Comments on the Burden Estimates and Submission Times for this Information Collection:

- **Comment #1:** Multiple advocacy agencies, including the Consortium for Constituents with Disabilities (CCD), The National Organization of Social Security Claimants' Representatives (NOSSCR), and The National Association of Disability Representatives (NADR) commented that, while they appreciate that SSA solicited feedback on the burden estimates, and updated the burden to 600 minutes, at the same time, these advocacy agencies believe that SSA is still underestimating the average burden per response for the CDR in all modalities. These advocacy agencies suggest that it takes on average more than 13 hours (780 minutes) for respondents to gather everything they need, complete the form/screens, and obtain assistance as needed.

SSA Response #1: SSA updated the burden estimate for the SSA-454-BK and the i454 in 2023:

- We based the updated burden figures on the administrative data collection to account for 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).
- Note: This figure does not account for specific time keying in entries or responses, rather, it accounts for the amount of time the average respondent initiates the form until that average respondent submits it.
- In addition, we note that the average respondents are Title II or Title XVI disability recipients or their representatives. Some of these respondents may take longer to complete the forms and submit the information, while others will complete the forms faster, which is why we use average time estimates to calculate time burdens for these information collections.
 - Based on our current administrative data, the average of 600 minutes is accurate (as it accounts for some respondents taking 780 minutes or longer, and some respondents taking significantly less than 600 minutes to complete the form).

SSA regularly reviews and updates burden estimates with administrative data during clearance renewal cycles.

Finally, it is important to note that the beneficiary or recipient only needs to provide contact information for their medical sources, the beneficiary or recipient does not need to obtain any medical records or contact their medical provider for assistance to complete the form. SSA requests and collects medical evidence from providers with the beneficiary or recipient's authorization.

As per our current process, we will continue to monitor our administrative data and review public comments as we continually assess our burden estimates for the CDR modalities.

- **Comment #2:** Multiple advocacy agencies also commented on the time estimates for field office wait time and for telephone call wait time (call-back wait time), suggesting that these numbers are high, and can another three to four hours to the process for a respondent who needs help from an SSA technician to complete the CDR.

SSA Response #2: Since the time when we received these comments, we have published the 30-day Notice which reflects updated wait time information from December 2025, and we have also updated the documentation prior to submission to reflect the more up to date, January 2026 figures reflected on our website today. To highlight SSA's commitment to continually enhancing customer service delivery, as of January 2026, we have reduced our field office wait time to 21 minutes ([Social Security performance | SSA](#)), and our call response wait time to approximately 53 minutes (12 minutes for call pick up, as shown on SSA's performance website, [Social Security performance | SSA](#), and an average of 41 minutes to wait for a call back from a teleservice or field office technician, per our management information data). We continue to reassess these wait times, and work toward faster response times for the public.

- **Comment #3:** These same multiple advocacy agencies also requested that SSA expand the deadline for claimants to complete the SSA-454-BK (or electronic i454), as many individuals who are disabled or who live in rural areas are not able to check their mail daily. This means those individuals may not pick up the notice to complete the CDR until they only have a couple of days left to do so. In addition, these advocacy agencies note that many disabled individuals cannot sit, write, or concentrate for multiple hours on any given day, which would keep them from completing the CDR on time. Therefore, they strongly urge SSA to allow for more than 10 days to respond, including suggesting SSA extend the 10-day timeframe to at least 30 days.

SSA Response #3: SSA notes, the 10-day timeframe indicated on the Continuing Disability Review (CDR) cover letter, which the commenters referenced in sub regulatory guidance (NL 00705.350), is intended as a guideline for beneficiaries and recipients to complete the SSA-455, Disability Update Report (OMB No. 0960-0511). Rather, as per our sub regulatory guidance for the SSA-454 (shown in DI 13005.025), we grant respondents 30 calendar days to respond to the request to complete and return the SSA-454 (any modality).

To ensure we receive a response within 30 calendar days, a field office technician follows up with the selected individual after 15 days to ensure the document is returned timely. If the initial telephone contact is not successful, the technician calls the recipient again to follow-up, further affording the opportunity for the beneficiary or recipient to obtain any necessary assistance. SSA only makes a failure to cooperate decision 35 days after the date of the initial notice if the FO does not receive the completed forms, or 45 days afterwards, if the request requires special handling.

Comments on the Necessity and Utility of this Information Collection:

- **Comment #4:** NADR recognizes the importance of CDRs in maintaining program accuracy and ensuring that SSA provides benefits only to those who remain eligible. However, NADR suggests that the information SSA gathers must be directly and practically related to the eligibility determination. Therefore, NADR urges SSA to continually assess whether each piece of requested information is necessary to the CDR to prevent undue burden for individuals experiencing significant health, cognitive, or functional limitations.

SSA Response #4: In 2022 and 2023, SSA previously worked with internal and external partners (including advocacy agencies) to revise the form by streamlining the questions where appropriate. SSA regularly reviews and updates burden estimates with administrative data during clearance renewal cycles, and also continually assesses the necessity of the information we collect on the form.

Comments on Administrative Burden and Procedural Simplicity for this Information Collection:

- **Comment #5:** NADR notes that disability claimants are, by definition, individuals who may be especially vulnerable to administrative complexity. In addition, they opine that the CDR paperwork, while necessary, presents significant procedural hurdles for those respondents with mental, cognitive, or sensory disabilities. NADR suggests SSA remove repetitive or duplicative questions and examine each step of the process to ensure it serves a clear administrative need. Specifically, NADR recommends that SSA evaluate the information collection as follows:
 - Ensure SSA collects only the information necessary at each review stage, minimizing repeated requests for information already in SSA's records.
 - Grant representatives access to the claimant's MySocial Security account to assist with CDRs and related matters.
 - Provide clear, plain language instructions and definitions in all forms, notices, and communications.
 - Give claimants reasonable and flexible deadlines for submission, with the availability for extensions and support to those who request it.

SSA Response #5: As mentioned in our response to Comment #4 above, we continue to work with internal and external partners, including advocacy agencies, to revise the SSA-454-BK and streamline questions and processes wherever possible. Regarding clear, plain language, we continuously strive to make our forms as simple and comprehensive as possible while balancing the needs to explain legal and policy information as concisely as possible. SSA uses plain language to make our forms easier to understand and use, which is in line with the Plain Writing Act of 2010. We will continue to review the form to use language that avoids jargon and complex sentence structures.

With regards to representative access to the claimant's my Social Security account, while we are unable to currently allow representative access to claimant accounts, we will evaluate everything it entails and consider it for the future.

Comments on Ensuring Accessibility and Accommodations:

- **Comment #6:** NADR requests that SSA prioritize making all forms and notices accessible in accordance with federal law and best practices. Specifically, NADR urges SSA to:
 - o Offer all versions of the SSA-454-BK, including the i454, in multiple accessible formats, such as large print, screen-reader compatible files, and other alternatives.
 - o Ensure the CDR process includes clear, plain language instructions for requesting accommodations.
 - o Always allow claimants and representatives the option to submit forms via online tools, mail, fax, telephone, and in person.

SSA Response #6: In the past several years, we have made significant changes to enhance the accessibility of our forms, and we will continue to consider if changes are warranted in the future. Regarding ensuring the CDR process includes clear instructions for requesting accommodations, the first page of the SSA-454-BK contains clear instructions in plain language on what to do if the respondent needs help with form completion as well as guidance on the scope of information needed to complete the form.

Finally, SSA fully supports the importance of having multiple modalities to submit the completed SSA-454-BK. This is why the agency has made this mandatory information collection easier by offering several different modalities for submitting the CDR information including options to complete:

- (1) The paper Form SSA 454-BK and mail it back to SSA in a pre-postage paid envelope;
- (2) The paper Form SSA-454-BK and return it to a local field office;
- (3) The fillable PDF SSA-454-BK at home via our Upload Documents portal (OMB No. 0960-0830);
- (4) The Internet i454 at home and submit it electronically through the mySocial Security account link; or
- (5) The Intranet-based modality through scheduling a face-to-face (or teleclaim) interview with a claims specialist through an SSA field office.

While we do not offer an option to fax in the form because very few people use fax as a modality now, and faxing could lead to the unwanted exposure of unsecured, sensitive personal information; we believe that most respondents find at least one of the five available

options compatible with their needs.

Comments on Representative Access and Authority:

- **Comment #7:** NADR notes that representatives play a crucial role in assisting disability claimants throughout their claims, including through the CDR process. NADR requests that SSA ensure an effective CDR process through the following steps:
 - Grant representatives full and early access to necessary documentation, the claimant's records in Electronic Records Express (ERE, OMB No. 0960-0767), and the claimant's mySocial Security Account platforms to assist with CDRs and related matters.
 - Clarify that claimants have the right to designate and work closely with their representative at every step, including the submission of electronic documents.
 - Issue all notices and requests simultaneously to both claimant and their appointed representatives to avoid delays or miscommunication.

SSA Response #7: SSA acknowledges the crucial role representatives play in assisting disability claimants:

- As we mentioned in our response to Comment #5, before we can grant third party access to a claimant's mySocial Security account, we will need evaluate everything it entails, as it would also require us to create enhanced security measures to safeguard the claimant's information. While we cannot make these changes at this time, we will consider them for future enhancements to the mySocial Security portal.
- In addition, while SSA grants access to ERE records for representatives, we cannot grant access any earlier than we currently do, as first we need to receive the appropriate documentation showing the representative's authority to access the claimant's records. At this time, we grant access to ERE as quickly as we can after we receive the appropriate and necessary documentation.
- Regarding the claimants right to designate and work closely with their representative, we address that under OMB No. 0960-0814, Advance Designation of Representative Payee (SSA-4547), and we explain it on our website.
- Finally, we understand NADR's request to issue notices to both the claimant and their appointed representative simultaneously. While we offer the ability for respondents to choose that option, not all respondents do so. We will consider options for allowing this request in the future; however, as with third party access to claimant's information, we will need to evaluate the entire process before we can consider this request.

Comments on Technology and Modernization with Preserved Flexibility:

- **Comment #8:** NADR supports SSA's efforts to modernize processes for claimants, including promoting secure electronic applications such as the i454, and digital access to records and notices. However, NADR requests that SSA does not use technology as a substitute for traditional channels in ways that disadvantage claimants who lack access, skills, or comfort with digital tools. Rather, NADR recommends that SSA:
 - Maintains the availability and equal validity of paper, telephone, and in-person CDR processes.
 - Allows eSignature and printed signatures on faxed forms to reduced paperwork-related burdens, as "wet" signatures can be a barrier for those with mobility or transportation limitations.

SSA Response #8: SSA understands the importance of having multiple modalities to submit the completed SSA-454-BK, which is why we offer a variety of modalities for submission. As we mentioned above in our response to Comment #6, we offer the following modalities for submitting the CDR information including options to complete:

- (1) The paper Form SSA 454-BK and mail it back to SSA in a pre-postage paid envelope;
- (2) The paper Form SSA-454-BK and return it to a local field office;
- (3) The fillable PDF SSA-454-BK at home via our Upload Documents portal (OMB No. 0960-0830);
- (4) The Internet i454 at home and submit it electronically through the mySocial Security account link; or
- (5) The Intranet-based modality through scheduling a face-to-face (or teleclaim) interview with a claims specialist through an SSA field office.

We maintain these five modalities and continue to update them to incorporate technology and modernization whenever possible.

Regarding the concern about "wet" signatures, please note that SSA does not require signature on any modality of the SSA-454 (paper or electronic). While we do not offer the ability to fax the form to us, as noted in our response to Comment #6 above, very few people fax the form, and most respondents find one of the above-mentioned five modalities sufficient to submission of the form to SSA.

Comments on Data Security and Privacy:

- **Comment #9:** NADR emphasizes the need for strong and transparent security protocols for the CDR process, due to the highly sensitive nature of the information SSA requests for a

CDR. NADR requests that SSA reassures claimants and their representatives that all personal information will remain confidential and protected against unauthorized access. In addition, they suggest SSA allow claimants to request to remove or delete specific records or documentation from their files, and that SSA allow representatives the ability to securely access necessary records to provide effective support to claimants, while ensuring the representatives and SSA consistently uphold all privacy and consent standards.

SSA Response #9: We always include a Privacy Act Statement on our forms and screens for all SSA-454 modalities which explains that SSA ensures personal information remains confidential and protected against unauthorized access. In our published System of Records Notices, we disclose with whom we may share any SSA records. We also obtain claimant or representative consent before requesting information from any additional source.

In addition, through limiting accessibility to claimant's information, we continue to maintain the security of claimant's mySocial Security Accounts or submitted information through Upload Documents. We do not allow respondents to remove records or documentation from their files; however, as per our Privacy Act Statement, we maintain the confidentiality and protect the security of the respondents' information which we preserve in our files and in each claimant's electronic record. Regarding third party access to claimant's records, as we discussed in our responses to Comments #5 and #7 above, we will evaluate the process and necessary security measures so we can consider this request in the future.

30-Day Comment Period Federal Register Notice (FRN):

The 30-day Comment Period began on December 17, 2025, and will end on January 16, 2026, at 11:59pm. We will review and respond to any public comments we receive during the 30-day comment period FRN. If we receive any comments in response to this Notice, we will forward them to OMB.