

Supporting Statement for Form HA-4633
Claimant's Work Background
20 CFR 404.1512(a); 404.1520(a)(4); 404.1565(b)
and 20 CFR 416.912(a); 416.920(a)(4); 416.965(b)
OMB No. 0960-0300

A. Justification

1. Introduction/Authoring Laws and Regulations

Sections 205(a), 702, 1631 (e)(1)(A) and (B) and 1869(b)(1)(C) of the *Social Security Act (Act)* provide the Commissioner of Social Security the authority to establish procedures for determining whether a claimant is entitled to disability benefits. The Social Security Administration (SSA) may ask individuals who apply for disability benefits under the *Act* to provide background information about work they performed in the past five years, as prescribed in 20 CFR 404.1512(a), 404.1565(b), 416.912(a), and 416.965(b) of the *Code of Federal Regulations*. Form HA-4633 facilitates the collection of a claimant's work background. It is used during the appeals process if the judge determines it is necessary to further develop the claimant's employment history, as per 20 CFR 404.1520(a)(4) and 416.920(a)(4). This revision is to an existing collection.

2. Description of Collection

SSA requires individuals applying for disability benefits to provide detailed information regarding any work they have performed in the past five years. SSA uses this information to evaluate disability claims to determine if the claimant meets the disability provisions under Title II and Title XVI. When SSA denies disability benefits to an individual, the individual has the right to request a hearing before an administrative law judge.

At the hearings level, we send the claimant the HA-4633, along with other forms associated with developing evidence, such as the HA-4631 (Claimant's Recent Medical Treatment, OMB Control No. 0960-0292) and the HA-4632 (Claimant's Medications, OMB Control No. 0960-0289), to ensure that the record is accurate and reflects the most current information during the appeals process. The judge uses the information collected from the HA-4633 form to: (1) identify the claimant's relevant work history; (2) determine if expert vocational testimony is required and, if so, ensure a vocational expert is available to testify during the hearing; and (3) provide a reference for discussing the claimant's work history during the hearing. The completed form is exhibited and entered as evidence of record.

Psychological Cost:

- **Requirement for the Program:** The HA-4633 provides the judge detailed information about an individual's past work. This information will help the judge decide whether the claimant is entitled to disability benefits.

Psychological Cost: Respondents might mistakenly perceive that the questions posed could adversely affect their application for disability benefits. As a result of this perception, some individuals may experience stress throughout the process that may deter them from completing and returning the required form.

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 determine entitlement to benefits. Therefore, we have taken this potential psychological cost into account when calculating our burden in #12 below.

The respondents are individuals, and their representatives, that applied for disability benefits under Title II and Title XVI, who requested a hearing before an ALJ after SSA denied their application for disability payments.

3. Use of Information Technology to Collect the Information

A select population of claimants complete the HA-4633 based on the conditions of each individual claimant's hearing. While SSA provides a fillable PDF version of the HA-4633 on our website that claimants can download and print, most claimants receive the form in the mail along with a postage paid envelope and a notice explaining the need for a completed HA-4633 (as well as other forms that may support developing evidence for the case). If claimants so choose, they can also access the fillable PDF version of the HA-4633 through our Upload Documents portal (OMB No. 0960-0830). The respondents who use Upload Documents complete the static fillable PDF and submit it directly to SSA through Upload Documents. Those respondents who choose not to use Upload Documents complete the paper version and mail it to SSA.

Representatives can submit and upload their claimant's completed HA-4633 electronically through Electronic Records Express (ERE) (OMB No. 0960-0753). When the appointed representative uploads and properly labels a form, the system electronically notifies the hearings office that a new document arrived. Approximately 83% of claimants have an appointed representative. At this time, the majority of respondents who do not have appointed representatives either mail in the form or use the Upload Documents version to submit it electronically. We do not currently keep track of how many respondents are using the Upload Documents portal. When we have that data, we will include it here.

4. Why We Cannot Use Duplicate Information

The nature of the information we collect and the manner in which we collect it preclude duplication. While the initial DDS claims collect similar information, we need updated information at the hearing level. SSA has not studied the degree to

which the information a claimant provides on the SSA-3369 (OMB No. 0960-0578) is fully duplicative of the information the claimant provides on the HA-4633.

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 SSA did not collect this information, claimants might not present evidence pertinent to their claims for disability benefits. As defined in the *Act*, Form HA-4633 collects the minimum information necessary for a judge to assess an individual's work history, thus creating a legal impediment to reducing the overall burden requirement on the public. As SSA collects the information only when this situation arises, the agency 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 September 3, 2025, at 90 FR 42667, and we received no public comments. The 30-day FRN published on March 23, 2026, at 91 FR 13922. 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

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. While we believe some respondents may perceive that the questions posed could adversely affect their application for disability benefits, they are not sensitive, and we addressed this psychological cost in #2 above.

12. Estimates of Public Reporting Burden

SSA calculated the burden in the chart below using our management information data by estimating the amount of time respondents take to learn about the program; receive

notices as needed; read and understand instructions; gather the data and documents needed; answer the questions and complete the information collection instrument.

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)*	Total Annual Opportunity Cost (dollars)**
0960-0300 HA-4633 (Paper Form)	48,450	1	20	16,150	\$14.27*	\$230,461**
0960-0300 HA-4633 (ERE)	236,550	1	20	78,850	\$32.66*	\$2,575,241**
Totals	285,000			95,000		\$2,805,702***

Note: The above chart breaks down the type of submissions (paper and ERE submissions) for ease of viewing the 83% of respondents who submit via ERE; however, because there is no burden difference for submission type, we did not create separate ICs in ROCIS, opting instead to indicate the 83% in the box provided for Percentage of Respondents Reporting Electronically. In addition, the vast majority of respondents using the paper form mail it back to SSA without traveling to a hearings or field office. As such, we assume no travel or wait times associated with this form.

* We based this figure on the average DI payments based on SSA's current FY 2024 (this is the most current figures we have for the DI payments) data ([Effect of COLA on Average Social Security Benefits](#)); on the average U.S. citizen's hourly salary, as reported by Bureau of Labor Statistics data ([Occupational Employment and Wage Statistics](#)).

** 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.**

We base our burden estimates on current management information data, which includes data from years of conducting this information collection. Per our management information data, we believe that 20 minutes accurately shows the average burden per response, reading the instructions, gathering the facts, and answering the questions. Based on our current management information data, the

current burden information we provided is accurate. The total burden for this collection instrument is 95,000 burden hours (reflecting SSA management information data), which results in an associated theoretical (not actual) opportunity cost financial burden of \$2,805,702. 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 **\$2,784,089**. This estimate accounts for costs from the following areas:

Description of Cost Factor	Methodology for Estimating Cost	Cost in Dollars
Designing, Printing, and Distributing the Form	Design Cost + Printing Cost + Distribution Cost	\$1,050
SSA Employee (e.g., field office, 800 number, DDS staff) Information Collection and Processing Time	GS-9 employee x # of responses x processing time	\$2,781,600
Systems Development, Updating, and Maintenance	GS-9 employee x man hours for development, updating, maintenance	\$1,439.20
Total		\$2,784,089

SSA is unable to break down the costs to the Federal government further than we already have. First, because we work with almost every US citizen, we often do bulk mailings and cannot track the cost for a single mailing. We do not track design costs or upkeep costs (as these are based on employee time and may vary from collection to collection). 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. Finally, SSA prefers not to provide breakdowns of estimated payment to employees who process these items for a variety of reasons (only one of which is that it is not possible to do this entirely accurately).

15. Program Changes or Adjustments to the Information Collection Request

There are no changes in the public reporting 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 Form SSA-4633, 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. Because 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.

Note: Because the static PDF version of the form on Upload Documents is the same as the PDF version on our website, it also does not display an expiration date.

For the Internet version of Form SSA-4633 housed under ERE (OMB No. 0960-0753), 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.