

Addendum to 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

Terms of Clearance:

On March 2, 2023, OMB placed the following Terms of Clearance on this ICR:

The agency made substantial modifications to the supporting statement to provide additional details regarding the need for the collection, the reason respondents are selected for the collection, business processes surrounding the solicitation and collection of this information, electronic submission options, and reasons the collection is non-duplicative. The agency should generally consider evaluating, as a part of its Learning Agenda, the degree to which information provided on hearings-level forms such as HA-4633 is similar to information previously provided by respondents during the initial application or reconsideration process.

SSA Response:

The agency made modifications to the supporting statement to provide additional details regarding business processes surrounding the solicitation and collection of this information, electronic submission options, and reasons the collection is non-duplicative. The agency is continuously evaluating as a part of its Learning Agenda, the degree to which information provided on hearings-level forms such as HA-4633 is similar to information previously provided by respondents during the initial application or reconsideration process. At this time, we determined that the information we collect on the HA-4633 is still necessary for the hearings process.

Revisions to the Collection Instrument

SSA is making the following revisions to the HA-4633:

- **Change #1:**

We are now only requiring respondents to provide information on their work history (jobs worked for a minimum of 30 consecutive days) for the past 5 years, versus the previous requirement of 15 years. We edited the form to reflect this new figure. As well, this change lowers the expected burden time from 30 to 20 minutes to complete the form (see our burden reduction in the chart below and in #12 of the Supporting Statement).

Justification #1:

On April 18, 2024, we published the final rule (FR), *Intermediate Improvement to the Disability Adjudication Process, Including How We Consider Past Work* at 89 FR 27653. At the time of publication, we also submitted a new Information Collection Request (ICR), which OMB approved under 0960-0834 on May 28, 2024. The FR-related ICR, 0960-0834, combined all of the FR-related changes for all of the forms associated with the FR. Upon

OMB’s approval of the ICR 0960-0834, we integrated the requested changes to Form HA4633 which OMB approved.

As per our agreement with OMB when we received the approval for 0960-0834, we are now moving the regulatory changes to Form HA-4633 which we implemented due to the FR back under the already established OMB approval for this form (0960-0300).

Therefore, we made this change to align with the new requirements of the final rule. We are also incorporating the reduced burden estimate because we are requiring respondents to provide significantly less information than previously, so it now takes them much less time to complete the form. In addition, the information we are asking respondents to document will be more recent, and as such will presumably take less time to recall.

- **Change #2:**

We added a Psychological Cost as a requirement per the Office of Information and Regulatory Affairs Memorandum M-22-10 issued on April 13, 2022.

Justification #2:

Office of Information and Regulatory Affairs Memorandum M-22-10 issued on April 13, 2022, states Psychological Costs must be reported. As a result, SSA is adding Psychological Costs.

Burden Reduction Due to the Implementation of the FR, as Per the Documentation Under 0960-0834:

The following chart shows the burden reduction for Form HA-4633, associated with the final rule, which OMB approved on May 28, 2025:

OMB #; Form #; CFR Citations	Number of Respondents	Frequency of Response	Current Average Burden Per Response (minutes)	Current Estimated Total Burden (hours)	New Burden Per Response Under Regulation (minutes)	Anticipated Estimated Total Burden Under Regulation (hours)	Estimated Burden Savings
0960-0300 HA-4633 (Paper Form) 404.1560; 416.960	48,450	1	30	24,225	20	16,150	8,075
0960-0300 HA-4633 (ERE) 404.1560; 416.960	236,550	1	30	118,275	20	78,850	39,425
Totals	285,000			142,500		95,000	47,500

The following chart shows the theoretical cost burdens associated with the final rule:

OMB #; Form #; CFR Citations	Number of Respondents	Anticipated Estimated Total Burden Under Regulation from Chart Above (hours)	Average Theoretical Hourly Cost Amount (dollars)*	Total Annual Opportunity Cost (dollars)**
0960-0300 HA-4633 (Paper Form) 404.1560; 416.960	48,450	16,150	\$14.27*	\$230,461**
0960-0300 HA-4633 (ERE) 404.1560; 416.960	236,550	78,850	\$32.66*	\$2,575,241**
Totals	285,000	95,000		\$2,805,702***

* 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.**

Note: As per our agreement with OMB upon approval of the ICR for the FR (OMB No. 0960-0834), and our finalized revisions to the form, we are revising this ICR move the above, already approved changes under the established OMB approval for Form HA-4633 (0960-0300).

Upon approval of this request, as well as similar requests for 0960-0578 and 0960-0579, we will discontinue the OMB approval for 0960-0834 to avoid double-counting the burden for these forms.