Supporting Statement for Form HA-520/i520
Request for Review of Hearing Decision/Order
20 CFR 404.967-404.981, 20 CFR 416.1467-416.1481
OMB 0960-0277

A. Justification

1. Introduction/Authorizing Laws and Regulations

Section *205(a)* of the *Social Security Act (Act)* authorizes the Commissioner to make rules necessary to implement Social Security programs. Section *1631(d)(1)* of the *Act* incorporates Section *205(a)* and applies it to Title XVI of the *Act.* The Commissioner published regulations at *20 CFR 404.967-404.981* and *20 CFR 416.1467-416.1481* of the *Code of Federal Regulations (Code)*, creating an Appeals Council review process. Additionally, The *Foster Care Independence Act of 1999*, section *251* of *Public Law (Pub.L.) 106-16*, established a new Title VIII of the *Act* for providing special cash benefits to certain World War II veterans. Section *809* of *Pub.L. 106-169* establishes hearing and review rights, and the procedural protocol to administer this program. The Commissioner published regulatory guidance for this program at *20 CFR 408.1050.*

Form HA-520, Request for Review of Hearing Decision/Order, provides a means for individuals to request a review by the Appeals Council (AC) of a hearing decision or dismissal order. The form also discloses who must file a written request and provide specific information to the Social Security Administration (SSA) as cited above.

2. Description of Collection

When a person applies for Social Security benefits, such as disability, retirement, or survivors' benefits, SSA reviews the application and associated record and makes a determination on that claim. When a claimant disagrees with SSA's determination or decision, he or she has a statutory right under the *Act* and current regulations to appeal that determination or decision. SSA has three levels of administrative review (appeal) described in *20 CFR 404.900* and *416.1400* of the *Code*: Reconsideration; Hearing by an administrative law judge; and AC review. Respondents use Form HA-520 to request AC review, as claimants and beneficiaries who disagree with an administrative law judge's hearing decision or dismissal on claims for initial or continuing entitlement or eligibility under Title II, Title XVI, and Title XVIII of the *Act* may request AC review.

When SSA issues the hearing decision or dismissal, they mail the claimant a copy of the decision or dismissal along with a Notice of Decision or Notice of Dismissal which provides instructions on how to request AC review. This information, along with a list of the information respondents need to respond, is also located on SSA's website. Both the Notice of Decision or Dismissal and SSA's website provide the claimant with a phone number to contact if they have questions or need support completing this process.

To initiate the appeals process, respondents must request in writing that the AC review the hearing decision. The completion and submission of the HA-520 or i520 is voluntary, and the AC will accept other written documentation requesting review. If the respondent utilizes Form HA-520 or i520, they may request AC review through filing a written request using Form HA-520 by mail or in a Field Office (FO), or by completing the Internet version of Form HA-520, the i520. If prepared in a FO, SSA staff help to instruct respondents on the sections they must complete (i.e., the claimant's name and social security number, and the claim number) and explain the voluntary sections to the respondent, along with the ones we recommend they complete (e.g., producing evidence, and the signature section). Respondents who choose to use the Internet option may either utilize the help screens within the i520 pathing or may call SSA to request a technician to help them.

SSA uses the information gathered on Form HA-520 to establish that the claimant filed the request for review within the prescribed time and to ensure the claimant completed the requisite steps permitting the AC review. The AC uses the information to: (1) document the claimant's reason(s) for disagreeing with the hearing decision or dismissal order; (2) determine whether the claimant has additional evidence to submit; (3) determine whether the claimant is requesting an extension of time, and (4) confirm whether the claimant has a representative or wants to appoint one, regardless of if they had a representative for their hearing request.

Respondents are generally claimants requesting review of a hearing decision or order of dismissal, or their appointed representative, guardian, parent of a minor claimant, or representative payee. If the respondent is a representative, he or she must file the appropriate SSA-1696 (Appointment of Representative) either prior to, or alongside the HA-520. When prepared in the FO, FO personnel may also assist by obtaining a Form SSA-1696 if necessary. However, the respondent may also be a third party filing the request for review on behalf of the claimant. If a third party responds, staff assisting the AC may contact the claimant to notify the claimant of the appeal and determine whether the claimant wants to proceed or whether the claimant was attempting to appoint the third party as a representative. Respondents may complete Form HA-520 alone or with help.

Form HA-520 collects information necessary for the AC to review the hearing decision or dismissal, including the claimant's name and social security number, and the claim number (if different than the social security number). Form HA-520 also collects information on why the claimant wishes to request AC review of the hearing decision or dismissal order (the "argument"). Respondents may submit arguments and appeal reasons which are highly variable in terms of length and specificity and may include conclusory statements such as "I am disabled" or multipage statements or briefs. Form HA-520 also requires the respondent to identify or submit with the form any additional evidence not previously submitted that relates to the period on or before the date of the hearing decision. If the respondents have additional evidence that relates to the period on or before the date of the hearing decision, they must inform the AC about it or submit it to SSA when they submit the completed form.

Additionally, Form HA-520 allows a claimant or an appointed representative to request an extension of time (EOT) to submit additional evidence or arguments to the AC. While the AC will accept an EOT request in writing or by telephone, the HA-520 and i520 include the option for the claimant to request an EOT on the forms themselves. For an initial EOT request, the AC generally provides the claimant or appointed representative 25 days from the date of the notice granting the EOT.

In situations where the respondent submits the HA-520 or i520 without providing additional evidence or argument, or requesting an EOT, the AC reviews the request based on the existing file.

Finally, when the FO receives a Form HA-520, whether by mail or from the claimant after they complete their sections in person, the FO also completes the SSA portion of Form HA-520 that confirms when and where we received the form; that we received it within 65 days of the hearing decision or dismissal order; and the type of benefits the claimant is appealing. If the FO receives the form after the 65-day window closes, the FO informs the claimant that he or she can provide additional documentation to justify good cause for filing late. For HA-520s filed in an FO, field staff produces copies to be kept in SSA records, given to the claimant, and given to any appointed representatives (if applicable).

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

- <u>**Psychological Cost**</u>
  - **Requirement for the Program:** Form HA-520 collects basic information SSA needs to process the appeal. Form HA-520 requests specific identifying information such as: the claimant's name; Social Security number; and contact information; name and contact information for any representative helping the claimant with the appeal; and the reason the claimant disagrees with the determination. In addition, the Notice of Decision or Dismissal places a time constraint on respondents of 60 days to submit the appeal.

  - **Psychological Cost:** Due to the request for more information and the time constraint on the appeal, the respondent may find the entire process stressful to the point that it may take them longer to complete the appeal process, or they may postpone it, or abandon completing a 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 completion of this collection to process the appeal. Therefore, we have taken this potential psychological cost into account when calculating our burden in #12 below.

Respondents are claimants, or their appointed representative, guardian, parent of a minor claimant, or representative payee, requesting review of a hearing decision or order of dismissal.

3. **Use of Information Technology to Collect the Information**
In accordance with the agency's Government Paperwork Elimination Act plan, we developed the Internet version of Form HA-520, the i520. The i520 allows claimants and appointed representatives to submit appeals and evidence electronically. Based on our data, we estimate approximately 89% of respondents under this OMB number use the electronic version.

In addition, we also created a public-facing fillable and submittable PDF version which the respondent can submit using SSA's Upload Documents Portal (OMB No. 0960-0830). Upload Documents allows the respondent to complete the static fillable PDF, electronically sign it, and submit the information through the Upload Documents Portal. The submittable version mirrors the paper version and provides respondents with an online service option as an alternative to mailing, faxing, or bringing the form to an SSA field office. Use of the Upload Documents Portal does not require respondents to download and install the application locally on their device or pay any subscription or licensing fees, and we account for the burden to navigate to the form in Upload Documents under OMB No. 0960-0830. Since the burden for completing the static PDF remains the same as filling the form out with an SSA technician, we do not show any separate burden for the fillable PDF version in #12 below.

4. **Why We Cannot Use Duplicate Information**
The nature of the information we collect and the manner in which we collect it precludes duplication. SSA does not use another collection instrument to obtain similar data.

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 this information, claimants would have no way to request review of a hearing decision or dismissal to the AC. Because we only collect this 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 June 26, 2026, at 91 FR 38753, and we received no public comments. The 30-day FRN published on August

27, 2026, at 91 FR 55418. 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 development 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**
This information collection does not contain any questions of a sensitive nature.

12. **Estimates of Public Reporting Burden**
Please see the burden chart below:

Method 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)****
HA-520 – Paper	9,002[+]	1	15	2,251	$14.27*	21**	$77,087***
i520 – Internet	72,853	1	15	18,213	$14.27*		$259,900***
Totals	**81,855**			**20,464**			**$336,987*****

[+] We note that this figure may include forms completed by the FO, or submissions of the fillable PDF through Upload Documents (OMB No. 0960-0830).

* We based this figure on disability payments, based on SSA's current management information data (Effect of COLA on Average Social Security Benefits).

**We based this figure on the average FY 2026 wait times for field offices (average wait time of 21 minutes), based on SSA's current management information data. This figure reflects data from our systems and the data posted on our public facing website (Social Security performance | SSA) on the date we drafted this document. As the figures fluctuate, the wait times may be different on the website than they appear here. We continue to monitor our website and management information data to ensure we report updated figures when possible. While we have included wait time for all respondents, we note that respondents are not required to complete the form in person and those who mail or drop off a completed form do not experience any wait time.

*** 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 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)**** **
9,002	1	30	4,501	$64,229****

**** 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 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):

Total Number of Respondents	**Frequency of Response**	**Estimate Learning Cost**	**Estimated Total Annual Burden (hours)**	**Total Annual Opportunity Cost for**

		(minutes)		Learning Cost (dollars)**
81,855	1	15	20,464	$292,021*****

*****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 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 **15** minutes shown in our chart above accurately shows the average burden per response for 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 ICR is **20,464** burden hours (reflecting SSA management information data), which results in an associated theoretical (not actual) opportunity cost financial burden of **$695,363**. 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 to the respondents.

14. Annual Cost to Federal Government

The annual cost to the Federal Government is approximately $246,150. 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 + Printing Cost	$1,503
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	$241,227
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	$3,420

Quantifiable IT Costs	Any additional IT costs	$0*
Total		**$246,150**

* 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. It is difficult for us to break down the cost for processing a single form, as field office 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

When we last cleared this IC in 2023, the burden was 34,742 hours. However, we are currently reporting a burden of 20,464 hours. This change stems from a decrease in the number of responses from 151,600 to 81,855, caused by normal fluctuations in respondents requesting AC level review. Although the number of responses changed, SSA did not take any action to cause this change. In addition, we decreased our burden per response for this form, which decreased the overall burden for the ICR. These figures represent current Management Information data.

Note: The total burden reflected in ROCIS is **48,730**, while the burden cited in #12 of the Supporting Statement is **20,464**. 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 of Information Collection Results

SSA will not publish the results of the information collection.

17. Displaying the OMB Approval Expiration Date

For the paper Form HA-520, 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 i520, 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 did not use statistical methods for this information collection.