

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

Background

The HA-520 and HA-520-SP forms, (*Request for Review of Hearing Decision/Order*), provide a means for individuals to request a review by the Appeals Council (AC) of an administrative law judge's (ALJ) hearing decision or dismissal of a hearing request.

Terms of Clearance

OMB placed the following Terms of Clearance on this Information Collection when they last approved it on 8/31/2023:

The agency clarified the description of the information collection, revised the burden estimates, and made minor updates to the form.

No later than one year prior to resubmission of this information collection for triannual renewal, the agency will evaluate (and inform OMB of the results of the evaluation) the following additional modifications to the HA-520 and/or the i520:

- Whether it would effectively reduce respondent burden (without unduly confusing respondents) to provide an example of the types of responses respondents typically provide to “reason for appeal/supporting argument;” (with reference to any public feedback received on this point);
- Remove or make optional the requirement to provide the date of the notice and/or the “SSA program title” on the i520, with consideration of how optionality might best balance the agency's objectives with determining the timeliness of the request with the burden imposed on respondents for locating this information;
- Modify the “You have successfully submitted” receipt page to (1) more explicitly inform respondents that this information is still accessible via MySocialSecurity; and (2) clarify that the acknowledgement of the Request for Review will be sent by mail.

Additionally, prior to or upon submission of the sixty-day Federal Register notice during the next triannual renewal of this information collection, the agency will notify at least one legal aid organization and one claimant representative organization that the information collection is available for public comment. The agency will share these terms of clearance with these organizations.

- **Term #1:** The agency clarified the description of the information collection, revised the burden estimates, and made minor updates to the form.

SSA response: In 2023, SSA revised the Supporting Statement to clarify the description of the information collection, revise the burden estimates, and make minor updates to the form. We have maintained these revisions in the updated Supporting Statement we are submitting for this renewal.

- **Term #2:** No later than one year prior to resubmission of this information collection for triannual renewal, the agency will evaluate (and inform OMB of the results of the evaluation) the following additional modifications to the HA-520 and/or the i520:

SSA response: Please see our responses to each individual Term (bullet point) which we addressed below.

- **Term #3:** Whether it would effectively reduce respondent burden (without unduly confusing respondents) to provide an example of the types of responses respondents typically provide to “reason for appeal/supporting argument;” (with reference to any public feedback received on this point);

SSA response: We believe examples would not be helpful and may cause claimants to self-limit their submissions. Each appeal is unique and respondents have myriads of reasons for appeals. While there are statutory reasons the AC will grant review, the claimant does not need to cite the statutory reasons or make any specific legal argument for the AC to review their case. Indeed, the mere submission of the form without any argument triggers a review and the AC will do a complete review of the file and hearing decision or dismissal, regardless of any arguments submitted. Since we want to allow respondents to submit any appeal language (or none at all, as they choose), our recommended approach is to not provide examples which could cause someone to believe that SSA would not accept their reason for appeal.

- **Term #4:** Remove or make optional the requirement to provide the date of the notice and/or the “SSA program title” on the i520, with consideration of how optionality might best balance the agency's objectives with determining the timeliness of the request with the burden imposed on respondents for locating this information;

SSA response: We believe that collecting the date of notice and program title is necessary to efficiently adjudicate appeals. A claimant may have multiple applications for multiple claim types pending with the Social Security Administration at different levels of adjudication. Requiring the date of the notice and program title clarifies the claimant’s intent regarding which application they are requesting SSA review, thereby ensuring review of the correct application and also facilitating the identification of erroneous filings. Accordingly, our recommended approach is to continue to require this information.

- **Term #5:** Modify the “You have successfully submitted” receipt page to (1) more explicitly inform respondents that this information is still accessible via [my Social Security](#); and (2) clarify that the acknowledgement of the Request for Review will be sent by mail.

SSA response: We believe that these changes are not necessary. We already inform i520 respondents about the ability to check the status of their appeal electronically. SSA’s homepage includes a link to check the status of a claim. Additionally, the first screen of the i520 application, under “More Information” provides a guide to “The Appeals Process” which informs respondents that they can check the status of their appeal by using their [my Social Security](#) account and clicking on “Application Status” (OMB No. 0960-0789). The “Application Status” screen then provides the respondents with a list of all of the claims they have in progress and allows them to check the status of each one. Regarding the acknowledgement letter, while we send this letter by mail, we also upload it to a claimant’s electronic folder and so is available via a claimant’s [my Social Security](#) account. Accordingly, we do not believe that these changes to the “You have successfully submitted” receipt page are necessary.

- **Term #6:** Additionally, prior to, or upon submission, of the sixty-day Federal Register notice during the next triannual renewal of this information collection, the agency will notify at least one legal aid organization and one claimant representative organization that the information collection is available for public comment. The agency will share these terms of clearance with these organizations.

SSA response: Both the National Organization of Social Security Claimants’ Representatives (NOSSCR) and the National Association of Disability Representatives (NADR) already monitor SSA’s publications in the Federal Register and then ask for the documents for those ICRs they are interested in reviewing whenever we publish a new FRN. We have noticed they ask for documentation from almost every ICR for which we publish an FRN. In addition, both NOSSCR and NADR requested to review the documentation for this ICR when we published the 60-day FRN in June 2026; however, they chose not to submit any public comments on this ICR at this time. As we believe that NOSSCR and NADR will continue their practice of requesting the documentation for every ICR for which we publish FRNs, we do not believe separate notice is necessary.