

Supporting Statement for Form SSA-9000-F6
Request for Accommodation in Communication Method
45 CFR 85.51
OMB No. 0960-0777

A. Justification

1. Introduction/Authoring Laws and Regulations

In the court case of the *American Council of the Blind, et al v. Michael Astrue and Social Security Administration*, the U.S. District Court for the Northern District of California ordered the Social Security Administration (SSA) to give blind or visually impaired Social Security applicants, beneficiaries, recipients, and representative payees the opportunity to elect one of five alternative formats to receive notices about program benefits. SSA expanded those options and currently offers seven alternative notice options. SSA developed Form SSA-9000-F6, Request for Accommodation, to gather information from blind or visually impaired individuals about why they require a particular accommodation, other than the accommodations we already offer, to communicate effectively with SSA. Section 504 of the *Rehabilitation Act of 1973* (*Section 504*) states that no otherwise qualified disabled individual shall, solely because of his or her disability, be excluded from the participation in; be denied the benefits of; or be subjected to discrimination under any program or activity conducted by any Executive agency. This law is codified in 29 USC 794 (2010) of the *United States Code*. Under *Section 504* of the *Rehabilitation Act of 1973*, individuals with disabilities have the right to request an accommodation of their choice. *Section 504* requires SSA to take appropriate steps to ensure effective communication and meaningful access for these individuals, and to furnish appropriate auxiliary aids or services where necessary to afford individuals with disabilities equal opportunities to participate in, and enjoy the benefits of, a program or activity conducted by the agency. Through the SSA-9000-F6, an individual with a disability can request an accommodation to communicate effectively with the agency or to gain meaningful access to programs and services.

2. Description of Collection

SSA allows disabled or impaired Social Security applicants, beneficiaries, recipients, and representative payees to choose one of seven alternative methods of communication they want SSA to use when we send them benefit notices and other related communications. The seven alternative methods we offer are: (1) standard print notice by first-class mail; (2) standard print mail with a follow-up telephone call; (3) certified mail; (4) Braille; (5) Microsoft Word file on data CD; (6) large print (18-point font); or (7) audio CD. However, respondents who want to receive notices from SSA through a communication method other than the seven methods listed above must explain their request to us. Those respondents use our iAccommodate Intranet or mySNO Internet screens, or the paper Form SSA-9000-F6 to: (1) describe the type of accommodation they want from SSA; (2) disclose their condition necessitating the need for a different type of accommodation; and (3) explain why none of the seven methods described above are sufficient for their needs. SSA uses our Internet and Intranet screens or Form SSA-9000-F6 to determine, based on applicable law and regulation, whether to grant the respondents' requests for an

alternate accommodation based on their impairment or disability. SSA collects this information electronically through either an in-person telephone interview during which the SSA employee keys in the information on our iAccommodate Intranet screens, or through the mySNO Internet screens which respondents may complete for themselves using the application available through their mySSA accounts. Additionally, the respondents may email their request or call the component responsible for adjudicating their request. Respondents only use the paper Form SSA-9000-F6 when the Intranet or Internet methods are unavailable, which is rare.

The respondents learn about this information collection from their local SSA office, 800-number communication, or by sending an inquiry email to Section.504.Public.Inquiry@ssa.gov, and may obtain additional information at www.myssa.gov. The agency is committed to ensuring the information collection process is available to anyone who conveys a need. When respondents are in need of alternative methods of communication, they reach out to the agency to provide their limitations and desired method to participate in the program. Upon review, the agency engages in an interactive discussion with each respondent to determine the most effective way to support the respondents' needs. SSA does not require respondents to complete this information collection to retain their benefits or payments. This information collection is a voluntary process for those respondents who wish to request an alternate method of communication with the agency.

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

Psychological Cost #1:

- **Requirement for Program:** The information collection invites individuals to provide relevant information regarding their disabling condition and limitation so SSA can determine whether the individual needs alternate accommodations to participate in SSA's programs.
- **Psychological Cost:** Respondents completing this form understand that disclosure of relevant information is necessary to support an accommodation request. The exercise of conveying one's disabling conditions or limitations may elicit negative emotions for some respondents; however, the information is necessary to support a request. If a respondent is reluctant to provide this information the agency is unable to approve the request.

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 receive an alternate method of communication other than the seven methods we already offer. Therefore, we have taken this potential psychological cost into account when calculating our burden in #12 below.

The respondents are disabled or impaired Social Security applicants, beneficiaries,

recipients, and representative payees who ask SSA to send notices and other agency communications to them in an alternative method besides the seven modalities we currently offer.

3. Use of Information Technology to Collect the Information

SSA created two electronic methods for respondents to submit this voluntary information to SSA: iAccommodate, an Intranet version of Form SSA-9000-F6 for respondents to use during a personal telephone interview with an SSA technician; and the mySNO Internet screens, available through the respondents' mySocial Security account. Respondents who have mySocial Security accounts with SSA may submit this information electronically to us via the Internet. Based on our current management information data, we estimate approximately 100% of respondents under this OMB number use either the Intranet or Internet versions of this form. Respondents only use the paper Form SSA-9000-F6 when the Intranet or Internet versions are unavailable, which is an extremely rare occurrence.

4. Why We Cannot Use Duplicate Information

The nature of the information we collect and the manner in which we collect it prevents 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 use the iAccommodate Intranet screens, the mySNO Internet screens, or the accompanying fillable PDF Form SSA-9000-F6, SSA would have no adequate means of determining whether to grant an individual's request for an additional or alternative notice format. Because we collect the 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 May 26, 2026, at 91 FR 30774, and we received no public comments. The 30-day FRN published on July 31, 2026, at 91 FR 48475. 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

The nature of the accommodation the individual may request, requires SSA to ask some questions of a sensitive nature. For example, SSA may ask individuals who request alternate accommodations to provide a complete list of disabling conditions relevant to their accommodation request and explain why they need a special accommodation for each limitation. SSA only requests information directly relating to specific disabling conditions and does not require supporting medical documentation. As such, this information collection could have psychological costs pertaining to collection of personal questions (which we also discussed in #2 above, and account for in our burden chart below). However, we must ask these questions to evaluate the accommodation request.

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 Cost Amount (dollars)*	Average Wait Time in Field Office or Teleservice Centers (minutes)**	Total Annual Opportunity Cost (dollars)***
SSA-9000/iAccommodate Intranet-based Telephone Interview	128	1	20	43	\$14.27*	5**	\$771***
mySNO Internet Screens	20,524	1	20	6,841	\$14.27*		\$97,621***
Totals	20,652			6,884			\$98,392***

* We based this figure on average disability payments based on SSA's current FY 2026 data ([Effect of COLA on Average Social Security Benefits](#)).

** We based this figure on the average FY 2026 answer times for teleservice centers (the average speed of answer), 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. Note: we included a telephone service answer time for all respondents using the paper form, we note that respondents do not complete the form in person, but only complete this information collection either via telephone or Internet. Respondents only use the paper form during the rare occurrence when the Intranet and Internet are unavailable.

*** 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: We did not include a travel time burden for this information collection, as 100% of the respondents complete this information collection either via telephone interviews or the Internet mySNO screens. Therefore, there is no travel time burden for this information collection.

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 (minutes)	Estimated Total Annual Burden (hours)	Total Annual Learning Cost (dollars)*****
20,652	1	20	6,884	\$98,235*****

*****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 time and 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 **20** minutes accurately shows 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). Based on our current management information data, the current burden information we provided is accurate. The total burden for this ICR is **6,884** burden hours (reflecting SSA management information data), which results in an associated theoretical (not actual) opportunity cost financial burden of **\$196,627**. 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 **\$283,000**. 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	\$0*
Distribution, 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	\$60,000
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	\$223,000
Quantifiable IT Costs	Any additional IT costs	\$0*
Total		\$283,000

* 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. First, since we work with almost every US citizen, 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. Also, 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 information collection in 2022, the burden was **4,472** hours. However, we are currently reporting a burden of **6,884** hours. This change stems from an increase in the number of responses for the mySNO Internet screens, which has gradually increased in usage over the past three years. While we are seeing an increase in the mySNO usage, which includes a significant overall decrease in the usage for iAccommodate, we also believe the increase is from a few new users for the mySNO application. There is no change to the burden time per response. Although the number of responses changed, SSA did not take any actions to cause this change. These figures represent current Management Information data.

*Note: The total burden reflected in ROCIS is **13,779**, while the burden cited in #12 of the Supporting Statement is **6,884**. This discrepancy is because the ROCIS burden reflects the following components: telephone call system answer times + learning costs. In contrast, the chart in #12 above reflects actual 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 **Intranet and Internet versions**, iAccommodate and mySNO, SSA is not requesting an exception to the requirement to display the OMB approval expiration date. For the **paper Form SSA-9000-F6**, 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. 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.

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.