Supporting Statement for Form SSA-521
Request for Withdrawal of Application
20 CFR 404.640
OMB No. 0960-0015

A. Justification

1. Introduction/Authoring Laws and Regulations

20 CFR 404.640 of the *Code of Federal Regulations* provides individuals with the option to withdraw their application for benefits either before or after the Social Security Administration (SSA) makes a determination of eligibility. Form SSA-521, Request for Withdrawal of Application, allows claimants to specify which application they want to withdraw and the reason for the withdrawal. Sections *202(a)-(c)*, Sections *205(a)-(i)*, Sections *223 (a)*, and Section *1872* of the *Social Security Act (Act)*, and Sections *20 CFR 404.310-404.311*, *404.315-404.322*, *404.330-404.333*, *404.601-404.603*, *404.1501-404.1512*, and *42 CFR 406.-408* of the *Code of Federal Regulations* explain eligibility and entitlement criteria for each benefit and application requirements.

2. Description of Collection

SSA directs respondents who request to withdraw their benefit applications to fill out form SSA-521, which documents the information SSA needs to process their request. Form SSA-521 is our preferred instrument for a withdrawal request; however, any written request for withdrawal signed by the claimant or a proper applicant on the claimant's behalf suffices. Typically, respondents complete the form themselves and do not need information from someone else to complete the form.

SSA provides three modalities of Form SSA-521 on our website: (1) a static portable document forms (PDF) version of the paper form which respondents can print, complete manually, sign in ink, and submit to SSA; (2) a fillable PDF version which respondents can complete, print, sign in ink, and submit to SSA; and (3) a submittable, fillable webform version for respondents to electronically sign and submit to SSA through our Upload Documents portal (OMB No. 0960-0830). The fillable webform mirrors the paper and PDF versions of the form.

Respondents can request the withdrawal of their application either before SSA makes a final decision (i.e., pre-adjudication) or after SSA awards benefits (i.e., post-adjudication). For pre-adjudication requests, the respondents filed an application, but SSA still needs to complete the adjudication process. In this situation, the respondent fills out the form and, since SSA has not yet paid any benefits (i.e., SSA has not awarded/adjudicated the benefit application), the SSA representative annotates the receipt of the SSA-521 in the Post-Entitlement Online System (POS) and processes the withdrawal, which nullifies the filed benefit application.

In situations where the respondent submits the withdrawal request after receiving benefit application payments (post-adjudication), the SSA representative receives the form, enters the information into the POS to suspend payments, and transmits the form to the servicing Processing Center (PC) for further actions. PC technicians then review the record to determine whether other beneficiaries entitled to the record require consent for the requested withdrawal that affects their benefits. They calculate the total amount of benefits the claimant must repay and send a notification to the claimant, providing 45 days to send the funds to SSA. The notification also states whether SSA included any Medicare service repayments.

If the claimant or beneficiary repays the benefits, SSA approves the withdrawal request. Once SSA completes the process, claimants receive notice of the withdrawal approval. If the claimant does not repay the benefits within 45 days, the SSA technician sends a follow-up notice providing another 30 days. If the technician does not receive payment after an additional 30 days, the technician denies the withdrawal request, notifies the claimant, and resumes monthly payments.

Respondents can independently learn about the requirements for withdrawal by using a keyword search on the agency's public facing website. They can read about frequently asked questions, news releases, regulations, and non-sensitive policies involving the withdrawal process. Respondents may also contact the agency by mail, telephone, or in person to inquire about withdrawals. If they contact and speak with an SSA representative, the representative can begin the process by sending the link to the fillable SSA-521 which enables respondents to submit it via Upload Documents.

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

Psychological Cost:

- **Requirement for Program:** The SSA-521 asks for basic personal identifying information and the reason for the request. It also provides information about how withdrawing the application will nullify a previously approved application, including the forfeiture of appeal rights. The form further explains the requirement to agree to repay any benefits received for the withdrawal request to be approved.

- **Psychological Cost:** Respondents may perceive the request to repay benefits as stressful and unfair which can lead to individuals choosing to delay or abandon completing this 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 be able to process their request to withdraw their application. Therefore, we have taken this potential psychological cost into account when calculating our burden in #12 below.

The respondents are beneficiaries or claimants receiving Retirement, Survivors, Disability, and Health Insurance benefits.

3. Use of Information Technology to Collect the Information

SSA created an online fillable PDF version of Form SSA-521 for individuals to complete, print, mail, or upload to SSA for processing. In addition, we created a public facing fillable and submittable version which the respondent can submit using SSA's Upload Documents Portal (OMB No. 0960-0830). Upload Documents allows the respondents to complete the fillable PDF, electronically sign it utilizing eSignature technology, and submit the information digitally to SSA. The submittable version mirrors the paper version and provides respondents with an online service option as an alternative to emailing, 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 for accessing Upload Documents under OMB No. 0960-0830; we include the burden for completing this form (even through Upload Documents) in #12 below, as it remains the same burden as the paper version.

In FY 25 we recorded 22,100 submission via the Upload Documents Portal, accounting for 27% out of the total 81,891 respondents.

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 use Form SSA-521, claimants would not be able to withdraw their application for benefits. Because we only 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 April 27, 2026 at 91 FR 22569, and we received no public comments. The 30-day FRN published on June 26, 2026, at 91 FR 38748. 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 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 Cost Amount (dollars)*	Average Wait Time in Field Office (minutes)**	Total Annual Opportunity Cost (dollars) ***
SSA-521 submitted before approving benefit application (pre-adjudication).	19,995	1	5	1,666	$33.54*	20**	$279,422***
SSA-521 submitted after receiving benefits. (post-adjudication)	61,896	1	5	5,158	$33.54*	20**	$864,997***
Totals	**81,891**			**6,824**			**$1,144,419*** **

* We based this figure on average U.S. worker's hourly wages, as reported by Bureau of Labor Statistics data (Occupational Employment and Wage Statistics).

** We based this figure on the average FY 2026 wait times for field offices (22 minutes) based on SSA's current management information data. This figure reflects both 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 daily, the wait times may be different on the website than they appear here. We continue to monitor our website and management information data on call back times to ensure we report updated figures when possible. While we have included wait time for all respondents using the paper form, 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. **<u>There is no actual charge to respondents to complete the application</u>**.

In addition, OMB's Office of Information and Regulatory Affairs (OIRA) 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)****
59,791	1	30	29,896	$1,002,712****

****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 time and 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	Estimate Learning	Estimated Total	Total Annual Learning Cost

	Response	Cost (minutes)	Annual Burden (hours)	(dollars)*****
81,891	1	5	6,824	$228,877*****

*****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 years of conducting this information collection. Per our management information data, we believe that **5** minutes accurately shows the average burden per response for 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 **6,824** burden hours (reflecting SSA management information data), which results in an associated theoretical (not actual) opportunity cost financial burden of **$2,376,008**. 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 **$1,132,811**. 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	$386
Distribution, Shipping, and Material Costs for the Form	Distribution + Shipping + Material Cost	$0*
SSA Employee (e.g., field office, program service center staff) Information Collection and Processing Time	GS-9 employee x # of responses x processing time	$682,425
Full-Time Equivalent Costs	Out of pocket costs + Other expenses for providing this service	$0*
Systems Development,	GS-9 employee x man hours	$450,000

Updating, and Maintenance	for development, updating, maintenance	
Quantifiable IT Costs	Any additional IT costs	$0*
Total		**$1,132,811**

* 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, because so many employees have a hand in each aspect of our forms; therefore, 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 cleared this ICR in 2023, the burden was 6,261 hours. However, we are currently reporting a burden of **6,824** hours. The increase in burden is due to increase in the number of responses from 75,127 to 81,891. These figures represent current Management Information data.

*Note: The total burden reflected in ROCIS is **81,891**, while the burden cited in #12 of the Supporting Statement is **6,824**. This discrepancy is because the ROCIS burden reflects the following components: field office waiting time + a rough estimate of a 30-minute, one-way, travel burden + 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 paper form SSA-521 (Request for Withdrawal of Application), 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, thereby 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. <u>Collections of Information Employing Statistical Methods</u>

SSA does not use statistical methods for this information collection.