

**Justification for Non-Substantive Changes to Form SSA-4641**  
**Authorization for the Social Security Administration to Obtain Account Records from a**  
**Financial Institution and Request for Records**  
**OMB No. 0960-0293**

**Background**

Section 1631(e)(1)(B)(ii) of the *Social Security Act* (the Act) and 20 *CFR* 416.207 require Supplemental Security Income (SSI) applicants, recipients, and their deemors to provide authorization for SSA to obtain any financial records that any financial institution may have about them as a condition of eligibility for SSI. In addition, section 1631(b)(1)(B) of the Act provides for the same authorization for use in considering whether certain overpayments may be waived. SSA uses the multi-purpose form, SSA-4641, across several modalities to collect authorization and to request records from financial institutions. As digital services become increasingly popular, SSA has prioritized making more forms available to the public on SSA.gov and through the Upload Documents portal (OMB # 0960-0830). In its multi-purpose state, the SSA-4641 is unavailable to the public because of its use in verification workloads. Financial institutions complete portions of the form, providing account balance information used in determining a person's eligibility for SSI. Making the record request portion of the form widely available to the public would create a fraud risk if bad actors were to use the form inappropriately to submit erroneous or fictitious information. We are therefore creating an abbreviated overprint version for SSI program purposes that omits the verification portion and allows the public to provide authorization electronically through Upload Documents. While creating the overprint, we found opportunities to improve disclosures on the long form SSA-4641 and are updating those as well for consistency across the various modalities.

Separately, SSA is expanding the use of the SSA-4641 in our effort to detect and prevent fraud and reduce improper payments. We currently use the electronic version of the SSA-4641 embedded in our Access to Financial Institutions (AFI) process to verify bank account information and search for undisclosed accounts. Aside from certain mandatory verifications during eligibility reviews, we generally only verify a person's financial accounts when they allege having \$400 or more in liquid resources. We are changing our business process to no longer consider the person's alleged resources during initial SSI applications. SSA will now perform a bank account verification for all initial SSI claim allowances. This change will reduce the program fraud and improper payment risks associated with undisclosed financial account assets. We expect this change will increase the public reporting burden associated with this collection, specifically as it relates to financial institutions receiving and completing SSI-related verification requests from SSA.

While the business process change to increase AFI verification will increase the public reporting burden to financial institutions, the form changes that provide a new service channel for SSI applicants and recipients to provide authorization will not increase burden. The burdens associated with the proposed overprint are already accounted for in the "Individuals (Paper and Internet)" modality as presented in the current supporting statement.

We are requesting approval of these changes outside the normal renewal cycle because SSA has prioritized efforts to detect and prevent program fraud, reduce improper payments, and improve customer service. We will implement our business process changes to increase AFI verifications as soon as practicable, with a target date of May 2026. We will implement the form changes to make the SSA-4641 OP1 authorization available to the public on SSA.gov and through Upload documents (OMB # 0960-0830) as soon as practicable following OMB approval.

### **Minor Revision to the Collection Instrument**

SSA is making the following revisions:

#### **SSA-4641 OP1**

**Change 1:** We are creating a new modality of completion for the SSA-4641. The new version will be published as an overprint (SSA-4641 OP1) and will not replace any existing modalities. The proposed version will include:

- the client information fields,
- updated authorization disclosures that conform to those described in Change 2, and
- signature and witness fields from the first two pages of the SSA-4641 (standard version).

The new form omits remaining portions of the form completed by financial institutions and designed to request records.

**Justification 1:** Providing financial authorization is required for SSI eligibility. The abbreviated version is needed to make the financial authorization portions of the form available on the public facing SSA.gov website and accessible through Upload Documents (OMB # 0960-0830) for SSI program purposes. It omits the fields SSA uses in financial account verifications, which prevent the standard version of the SSA-4641 from being publicly available. In addition to expanding the form to Upload Documents, we will be able to offer other convenient service options using the streamlined collection. We will also be able to direct individuals to the SSA.gov website to print and sign the form and we can send the printed SSA-4641 OP1 to individuals who are not able or choose not to use Upload Documents.

#### **SSA-4641**

**Change 2:** We are updating the disclosures we provide on page/part one of both versions of the SSA-4641 to clarify the respondent's rights and responsibilities.

**Justification 2:** The information we previously listed did not clearly explain all the disclosures or when a respondent's authorization would terminate. The updated language more fully communicates the respondent's rights and responsibilities concerning the authorization.

**Change 3:** We are updating the Privacy Act statement on both versions of the form.

**Justification 3:** SSA's Office of the General Counsel is conducting a systematic review of SSA's Privacy Act Statements on agency forms. As a result, SSA is updating the Privacy Act

Statement on this form.

**Change 4:** We are moving the financial account identification from the authorization portion of the form to a new Part Two of the form and broken up the various parts of this multipurpose form into four sections. We included brief instructions under the four parts indicating which party should complete the section. We have made minor conforming modifications to instructional text and headings.

**Justification 4:** These changes support the implementation of change 1 and provide for easier navigation of the form by the various respondents.

**Change 5:** We are updating the estimate of public reporting burden associated with this collection to reflect a small change in scope. While the number of public respondents providing authorization using the SSA-4641 is not changing even with the form changes discussed in Changes 1-4, the number of financial institutions receiving and responding to SSI-related records requests from SSA is changing. The increase in responses from financial institutions is due to a change in agency policy that will require bank account verifications for all initial SSI claim allowances, regardless of the applicant's allegations concerning their resources.

Modality 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) ****
Individuals (Paper and Internet)	1,439,800*	1	4	95,987	\$23.47****	23****	\$15,206,448****
Individuals (SSA-4641-OP1)	125,200*	1	4	8,347	\$23.47****	23****	\$1,322,300****
Financial Institutions (Paper SSA-4641)	158,789**	1	6	15,879	\$23.47****		\$372,680****
Financial Institutions (Internet e4641 or AFI)	28,503,538**	1	2	950,118	\$23.47****		\$22,299,269****
<b>Totals</b>	<b>30,227,327</b>			<b>1,070,330</b>			<b>\$39,200,697****</b>

\* This includes individuals completing the form to provide their authorization for purposes of determining SSI eligibility as well as individuals providing their

authorization for purposes of a waiver determination.

\*\* This likely is an overestimate because individuals providing their authorization for purposes of a waiver determination may, alternatively, provide their authorization using another form, the SSA-632, but we do not have readily available MI on how many individuals use that form instead of the SSA-4641.

\*\*\* We based this figure by averaging both the average DI payments based on SSA's current FY 2026 data ([Effect of COLA on Average Social Security Benefits](#)), and the 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 2022 wait times for field offices, based on SSA's current management information data.

\*\*\*\*\* 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.**

**Justification 5:** The change is part of a priority initiative to improve administration of the SSI program. Increasing verification efforts during initial applications will reduce program fraud and improper payment risks associated with undisclosed financial account assets.

We will implement these revisions upon OMB approval