

Supporting Statement for Form SSA-8510
Authorization for the Social Security Administration to Obtain Personal Information
20 CFR 404.704, 404.1926, 416.203, & 418.3001
OMB No. 0960-0801

A. Justification

1. Introduction/Authoring Laws and Regulations

The Social Security Administration (SSA) has authority to establish the necessary provisions to request proofs and evidence regarding eligibility for Social Security programs as per Sections 205(a) and 1631(e) of the *Act*. In addition, Sections 20 of the *Code of Federal (CFR) 404.703, 404.704, 404.1926, 416.203, and 418.3001* explain the different requirements and outlines the responder responsibility for providing evidence regarding eligibility for SSA programs.

2. Description of Collection

SSA requires individuals filing for benefits to provide us with evidence to establish eligibility for Social Security entitlement or Supplemental Security Income (SSI) payments. However, in certain situations where an individual has made every reasonable effort to provide evidence but is unable to obtain it, SSA may assist the individual by requesting it directly from an entity, organization, or independent source. To obtain evidence on an individual's behalf, SSA requires the individual to complete and sign Form SSA-8510, which authorizes SSA to request personal information and records from third parties. SSA sends the SSA-8510 to a public or private custodian of records on behalf of an applicant or recipient of an SSA program to request non-medical evidence information or proofs, which may support a benefit application or payment continuation.

SSA uses form SSA-8510 to request evidence or proofs to support the determination of the claimant's entitlement eligibility or payment amount. We ask for information such as the following:

- Age (e.g., birth certificate, court documents)
- Employer verification
- Marriage or divorce
- Pension Offsets
- Wages verification
- Annuities
- Dividends, royalties, or other similar payments
- Property information
- Benefit verification from a State agency or third party
- Immigration status (rare instances)
- Income verification from public agencies or private individuals
- Unemployment benefits
- Insurance Policies
- Alimony or Child Support payments

SSA may provide the custodian with a copy of the SSA-8510 if the custodian of the

records requires a signed authorization from the individual(s) whose information SSA requests. Once the respondent completes the SSA-8510, either using the paper form or using the Personal Information Authorization Intranet version, SSA uses the form as the authorization to obtain personal information regarding the respondent from third parties until the authorizing person (respondent) withdraws the claim or revokes the permission of its use.

The completion of SSA-8510 is voluntary as respondents can obtain the evidence SSA requires without our assistance. However, failure to submit the evidence to verify the individuals' eligibility can prevent SSA from making an accurate and timely decision for their benefits. SSA employees collect this information from individuals filing for benefits or currently receiving Social Security benefits or SSI payments, and who may indicate that they have made every reasonable effort to provide evidence, are unable to obtain it, and request SSA for assistance.

For situations where SSA requires medical information, SSA uses Form SSA-827, Authorization to Disclose Information to the Social Security Administration (OMB No. 0960-0623) to obtain medical records about the claimant's treatment, hospitalization, outpatient care, and educational records that may provide evaluations, assessments, and teacher observations for disability purposes. If SSA requires an individual's financial information, SSA uses Form SSA-4641, Authorization for SSA to Obtain Account Records from a Financial Institution and Request for Records (OMB No. 0960-0293) to authorize financial institutions to release a claimant's financial information to SSA. Form SSA-8510 is a consent form that allows SSA to obtain personal information or records from a third party on a claimant's behalf, and Form SSA-827 allows SSA to obtain medical records about the claimant's treatment. The SSA-8510 and SSA-827 are unrelated and cannot be substituted for each other, however; there may be situations in which SSA requires the claimant to complete both forms as these authorizations are for different purposes.

Individuals learn they need to complete Form SSA-8510 during an interview to file a benefit application or redetermination of SSI eligibility when a SSA technician explains the need to provide evidence. Individuals can also independently learn about the requirements and responsibility for providing evidence regarding eligibility for SSA programs by using a keyword search or reading the frequently asked questions on SSA's public facing website. If individuals speak with an SSA representative, the representative can begin the process by providing the link to the fillable SSA-8510 where the individuals can download and complete the form and return it to SSA.

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

Psychological Cost #1:

- **Requirement for Program:** Form SSA-8510 collects basic identity information and provides authorization for SSA to contact a public or private custodian of records to request non-medical evidence information.

- **Psychological Cost:** Individuals requesting SSA’s assistance obtaining evidence from public or private custodians of record may consider this authorization unnecessary, causing them not to provide SSA with the authorization.

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 benefits. Therefore, we have taken this potential psychological cost into account when calculating our burden in #12 below.

The respondents are individuals filing for benefits or currently receiving Social Security benefits or SSI payments who indicate they have made every reasonable effort to provide evidence, but are unable to obtain it, and request SSA for assistance.

3. **Use of Information Technology to Collect the Information**

SSA created an online Fillable PDF version of Form SSA-8510 for individuals to complete, print, and return to SSA for processing.

This collection has 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 respondent to complete the 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 for using Upload Documents under OMB No. 0960-0830.

This collection does not currently have a fully public-facing Internet version, as we prioritized other information collections for full electronic conversions. Given that IT Mod programming is an ongoing, dynamic project, we cannot provide specific timelines for when we will be able to make any particular ICR available via Internet web-based application. We will ultimately convert most existing ICRs to full electronic versions depending on how they fall within our overall IT Mod schema, but this may be unconnected to the PRA approval lifecycle.

Effective July 25, 2026, SSA also implemented a new conversational tone dynamic pathing version of the SSA-8510 through Upload Documents. The new approach presents questions on the form in a more easily understood, conversational style, making them accessible to all respondents regardless of their education or reading proficiency. In addition, as we use dynamic pathing for this process, the respondents only answer necessary questions based on their previous responses (e.g., if a respondent answers an initial question stating that they are not married, the conversational tone dynamic pathing will not ask any subsequent questions related to marriage). Once the respondents complete the conversational tone questionnaire, the Upload Documents system places their answers within the fillable PDF version of the form and presents the completed PDF

version of the form for the respondents' review and approval prior to eSignature (as needed) and submission through Upload Documents. This differs from the current dynamic pathing on the agencies full Internet applications, as Upload Document only ever presents the summary of the responses within a completed PDF version of the form, rather than through a summary screen.

Note: Since we just implemented the new conversational tone dynamic pathing model, and it differs from our current dynamic pathing model (on our established Internet applications), we do not, yet, have management information (MI) data regarding burden times for the new modality. We will submit a subsequent Change Request to OMB to show the updated burden for the conversational tone dynamic pathing version after we have a year of MI data to use. We anticipate submitting a Change Request in July 2027 showing the updated data.

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.

As stated previously, SSA maintains and uses the following additional forms for releasing certain types of information that are not handled through the SSA-8510:

- SSA-827, Authorization for Source to Release Information to the SSA (OMB No. 0960-0623) to authorize the release of medical records and educational records;
- SSA-4641, Authorization for SSA to Obtain Account Records from a Financial Institution and Request for Records (OMB No. 0960-0293) to authorize financial institutions to release a claimant's financial information to verify financial information for overpayment purposes or SSI eligibility.

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-8510, SSA would be unable to assist responders on obtaining evidence to verify their eligibility or payment amount, as well as being unable to make an accurate and timely decision for benefits. Because we 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 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 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-8510 (paper)	20,522	1	5	1,710	\$33.54*	20**	\$286,801***
SSA-8510 + (Upload Documents)	2,849	1	5	237	\$33.54*		\$7,949***
Totals	23,371			1,947			\$294,750***

*Note: As stated in #3 above, we do not currently have MI data which shows the burden for the new conversational tone dynamic pathing in Upload Documents. Therefore, we will submit a subsequent Change Request a year from now in 2027 to update the burden once we have MI data to support the burden information for the new modality.

* We based this figure on 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 2026 wait times for field offices (20 minutes). 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 individuals; rather, these are theoretical opportunity costs for the additional time respondents will spend to complete the information collection. **There is no actual charge to respondents to complete the application.**

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)****
5,843	1	30	2,922	\$95,433****

****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 Response	Estimate Learning Cost (minutes)	Estimated Total Annual Burden (hours)	Total Annual Learning Cost (dollars)*****
23,371	1	5	1,948	\$65,336*****

*****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 5 minutes 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 **1,947** burden hours (reflecting SSA management information data), which results in an associated theoretical (not actual) opportunity cost financial burden of **\$455,519**. 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 **\$439,986**. 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	\$180
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	\$49,206
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	\$390,600
Quantifiable IT Costs	Any additional IT costs	\$0*

Total		\$439,986**
--------------	--	--------------------

* 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. In addition, 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 IC in 2023, the burden was 16,706 hours. However, we are currently reporting a burden of 1,948 hours. This change stems from a decrease in the number of responses from 200,461 to 23,371. In 2023, SSA erroneously counted the number of SSA-8510 forms downloaded from our public website instead of the number of the completed SSA-8510 forms we received from respondents. We currently are only accounting for the number of forms we receive from the respondents and not the downloaded forms. 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 **20,997**, while the burden cited in #12 of the Supporting Statement is **1,947**. 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, and 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

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.