Supporting Statement for Form Form SSA-1696
Appointment of Representative
20 CFR 404.1707, 404.1720, 408.1101, 416.1507, and 416.1520
OMB No. 0960-0527

A. Justification

1. Introduction/Authoring Laws and Regulations

People claiming a right or benefit (claimants) under the *Social Security Act (Act)* must notify the Social Security Administration (SSA) in writing if they appoint an individual to represent them in dealings with SSA. SSA's regulations require claimants and representatives to complete and sign our prescribed notice of appointment, Form SSA-1696, Appointment of Representative. The statutory authority for requiring this information is in Sections *206* and *1631(d)* of the *Act.* In addition, we also codified these requirements in regulation sections *20 CFR 404.1707*, and *416.1507* of the *Code of Federal Regulations (Code)*. Sections *206(a)* and *1631(d)(2)* of the *Act* provide that when the individual representing the claimant is an attorney or a non-attorney meeting the requirements in Section *206(e)* of the *Act*, the Commissioner shall certify payment out of past-due benefits a fee equal to as much as 25 percent of past-due benefits. We also implemented these requirements in regulation sections *20 CFR 404.1720* and *416.1520* of the *Code*. These regulations also allow representatives to assign to an entity their right to receive direct payment of an authorized fee. If the entity meets applicable conditions, we accept an assignment and certify payment of the authorized fee to the entity. We implemented these regulatory requirements in sections *20 CFR 404.1730* and *416.1530* of the *Code.*

2. Description of Collection

As mentioned above, As part of SSA's regulations, SSA requires both claimants and representatives to sign our prescribed form and file it with SSA before SSA recognizes the appointment. Claimants must use Form SSA-1696 or the e1696 to appoint a representative to handle their claim before SSA. They may also use this SSA-1696 or e1696 (also designated SSA-1696-APP) to name their principal representative. Their selected representative(s) can use the SSA-1696 or e1696 to indicate whether they will charge a fee, to show their eligibility for direct fee payment, and to assign direct payment of their fee to an entity.

In addition, representatives also use the SSA-1696 or e1696 to inform SSA of their disbarment; suspension from a court or bar in which they previously admitted to practice; or their disqualification from participating in or appearing before a Federal program or agency.

Respondents learn about the SSA-1696, Appointment of Representative and the associated Forms SSA-1696-SUP1 and SSA-1696-SUP2 through SSA's website, Representing SSA Claimants | SSA, where they can also find the information they need to submit the SSA-1696 and the e1696. Claimants seeking to revoke an appointment can learn about the policy and associated information collection on our website via the Your

Right to Representation publication, where they can also find a link to the SSA-1696-SUP1. Representatives also learn about the SSA-1696 and the SSA-1696-SUP2 through SSA's website and through notices we send to them once a claimant files the SSA-1696 with the agency. SSA made all of these forms available on our website at Social Security Forms | SSA .

SSA uses the information on the SSA-1696 or e1696 to document the appointment of the representative. SSA also uses this form to collect the representative's business affiliation and employer identification number, as well as the information of any entity to which they assign direct payment of their fee (entities must register separately through submitting a completed form SSA-1694, OMB No. 0960-0731).

Claimants may use the SSA-1696-SUP1 to revoke their appointment of a representative. Representatives may use the SSA-1696-SUP2 to withdraw their acceptance of the appointment. SSA uses the information on the SSA-1696-SUP1 and SSA-1696-SUP2 to document the revocation and withdrawal of a representative.

Since the SSA-1696, Appointment of Representative, is a voluntary form for claimants to complete when they would like to appoint a representative and is an expected form for the appointed representatives to complete, we have no recorded psychological costs for this information collection.

The respondents are applicants for, or recipients of, Social Security disability benefits (SSDI); SSI payments; or anyone pursuing a benefit or invoking a right under SSA programs, who are notifying SSA they wish to appoint someone to represent them in their dealings with SSA; representatives being appointed by a claimant; as well as individuals revoking the appointment of a representative, and representatives withdrawing from an appointment.

3. Use of Information Technology to Collect the Information

Respondents can submit the e1696, electronically completed and signed, through an electronic portal on our website at www.ssa.gov/representation. In addition, respondents may also download and complete the fillable PDF version of the SSA-1696 from our website, request the representatives also sign it, and then submit it through our Upload Documents portal (OMB No. 0960-0830) as supplemental evidence (we do not currently have a fillable and submittable static webform of the SSA-1696 available through Upload Documents). \

We also made the SSA-1696-SUP1 and SSA-1696-SUP2 available in fillable PDF formats to download, when needed, from www.ssa.gov. Respondents can also fill out any of these forms, print, complete, and mail them to us with supporting documentation, fax/eFax the completed forms to dedicated fax numbers, or upload these complete forms through Upload Documents (OMB No. 0960-0830).

This collection has a public-facing fillable and submittable PDF version (e1696 – designated SSA-1696-APP) which utilizes Adobe Sign technology to accept and process an electronic signature (eSignature). The online 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. The respondents initiate the online version from our website and complete, electronically sign, and submit it online using the Adobe Sign web application. Use of the Adobe Sign web application does not present any added burden on respondents, nor does it require respondents to download and install the application locally on their device or pay any subscription or licensing fees. Respondents enter their responses into structured data fields on the screens within the Adobe platform by following a secure link that Adobe Sign sends to the email address the respondent provides. The respondent receives an email from Adobe Sign with instructions for how to access, complete, eSign, and submit the form using this online service. Upon submission, the online submittable version of the form electronically transmits an image of the completed form to the Electronic Viewing System (eVIEW) for SSA technicians to process. In Fiscal Year 2025, respondents submitted the SSA-1696-APP 80,528 times, accounting for approximately 2 percent of overall submissions.

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.

Representatives also have the option to electronically submit any of these forms through one of our electronic portals (e.g., ERE, OMB No. 0960-0753; or Upload Documents, OMB No. 0960-0830). When representatives submit these forms to us electronically, we store the form(s) in the claimant's electronic claims file.

4. Why We Cannot Use Duplicate Information

The nature of the information we collect and the manner in which we collect it preclude 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 SSA did not collect the information identifying each recipient's representative, we could not fulfill our obligations under the *Act* and regulations to recognize an attorney or other qualified individual a claimant named as an appointed representative. In addition, we only require the information from the SSA-1696-SUP1 and SSA-1696-SUP2 when necessary. SSA must identify the representative(s) for each claim or claimant; therefore, SSA cannot conduct this information collection 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
We estimate approximately **3,978,301** respondents complete these forms annually, as per the following burden chart:

Method of Completion	Number of Respondents	Frequency of Response	Average Burden Per Response (minutes)	Estimated Total Annual Burden (hours)	Average Theoretical Cost Amount (dollars)*	Total Annual Opportunity Cost (dollars) **
SSA-1696; e1696 (Appointed Representative)	1,852,171	1	5	154,347	$86.78*	$13,394,233**
SSA-1696; e1696 (Claimants)	1,852,171	1	7	216,087	$14.27*	$3,083,561**
SSA-1696-SUP1 (Claimants)	21,959	1	5	1,830	$14.27*	$26,114**

SSA-1696-SUP2 (Appointed Representative)	252,000	1	5	21,000	$86.78*	$1,822,380**
Totals	**3,978,301**			**393,264**		**$18,326,288****

* We based these figures on the average Lawyers, Judges, and Related Workers, hourly salary, as reported by Bureau of Labor Statistics data (Occupational Employment and Wage Statistics) and the average disability payments based on SSA's current FY 2026 data (Effect of COLA on Average Social Security Benefits).

** 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**.

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):

Method of Completion	**Total Number of Respondents**	**Frequency of Response**	**Estimate Learning Cost (minutes)**	**Estimated Total Annual Burden (hours)**	**Total Annual Learning Cost (dollars)*****
SSA-1696; e1696 (Appointed Representative)	1,852,171	1	2	61,739	$5,357,710***
SSA-1696; e1696 (Claimants)	1,852,171	1	3	92,609	$1,321,530***
SSA-1696-SUP1 (Claimants)	21,959	1	1	366	$5,223***
SSA-1696-SUP2 (Appointed Representative)	252,000	1	1	4,200	$364,476***
Totals	**3,978,301**			**158,914**	**$7,048,939*****

***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** or **7** 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 **393,264** burden hours (reflecting SSA management information data), which results in an associated theoretical (not actual) opportunity cost financial burden of **$23,375,227**. 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 **$8,119,509**. 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	$8,116,089
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	$3,420
Quantifiable IT Costs	Any additional IT costs	$0*
Total		**$8,119,509**

* 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 cleared this ICR in 2023, the burden was **269,167** hours. However, we are currently reporting a burden of **393,264** hours. This increase in burden is partially due to the requirement for respondents to use the SSA-1696 specifically (as per our previous approval under the regulatory changes for the Administrative Rules for Claimant Representation and Provisions for Direct Payment to Entities (Marasco Decision), which OMB already approved under OMB No. 0960-0832. We are including this minor burden increase here prior to discontinuing the OMB approval for 0960-0832. In addition, we have noted an increase in the usage of both the SSA-1696-SUP1 and SSA-1696-SUP2 over the past three years. Regarding the supplemental forms, while the number of responses increased, SSA did not take any actions which would cause this change, nor have we changed the burden per response for these two forms. These figures represent current Management Information data.

*Note: The total burden reflected in ROCIS is **552,178**, while the burden cited in #12 of the Supporting Statement is **393,264**. This discrepancy is because the ROCIS burden also includes the estimated learning costs for these forms. 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.