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Agency Information Collection Activities: Proposed Request

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Comment from Miller, Pierce

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General Comment

I disagree with the way this notice presents the burden and impact of these SSA information collections. My disagreement is not based on claiming that every number is false. My concern is that SSA's estimates measure only a narrow part of the process and may not represent the actual burden experienced by people dealing with Social Security.

SSA states that the SSA-4111 takes approximately 13 minutes to complete. Even if that estimate is accurate for filling out the form itself, it does not necessarily include the time required to understand the instructions, gather information, locate documents, contact SSA for clarification, deal with submission problems, or correct mistakes. Therefore, 13 minutes should not automatically be treated as the total burden associated with completing the request.

The same problem applies to SSA's calculation of a \$33.54 hourly opportunity cost. SSA correctly explains that this is a theoretical calculation and not an actual fee. However, an average wage does not represent every person affected by the process. Someone who is unable to work because of a disability may have a completely different financial situation from the average U.S. worker. The calculation therefore provides an average estimate, not an accurate measurement of the burden on each individual claimant.

SSA also uses an average field-office wait time of 22 minutes. SSA acknowledges that people who mail or drop off a completed form do not experience that wait. That means the estimate depends on how the person interacts with SSA and cannot accurately represent everyone's experience.

The SSA-3385 section is especially important because SSA states that DDS may send this form to a current or former employer when additional information about a claimant's job performance and day-to-day functioning is needed. SSA then uses that information as evidence when evaluating functional limitations and determining eligibility for SSDI or SSI.

Employer information can be useful, but an employer is not necessarily a medical professional or vocational expert and may not understand the Social Security definition of disability. An employer may

describe attendance, productivity, job duties, or what they observed at work, but that does not automatically establish a person's complete medical condition or ability to perform work on a sustained basis.

Someone can sometimes perform a task while employed and still have limitations that prevent them from maintaining employment consistently. Therefore, employer statements should be treated as one source of evidence and considered alongside medical records, treatment history, claimant statements, work history, and other relevant evidence. They should not automatically outweigh evidence from qualified medical sources.

Finally, SSA describes its customer-experience collection as voluntary, low-burden, and intended to improve government services. Those descriptions explain the agency's stated goals, but they do not prove that the overall Social Security experience is low-burden or effective for every person.

My point is simple: these estimates may accurately describe the limited paperwork activity SSA chose to measure, but they do not necessarily measure the full burden experienced by people navigating Social Security. A 13-minute form estimate does not measure the entire process surrounding the form. An average wage does not represent every claimant. An average waiting time does not represent every claimant. And an employer's observations do not represent the entirety of a claimant's medical or functional condition.

If SSA wants these estimates to accurately represent the public burden, it should account for the full process surrounding these requests and clearly distinguish administrative estimates from the actual experience of the people required to navigate the Social Security system.