

Supporting Statement for Form SSA-3373
Function Report – Adult
20 CFR 404.1512 and 20 CFR 416.912
OMB No. 0960-0681

A. Justification

1. Introduction/Authoring Laws and Regulations

Sections 205(a), 223(d)(5)(A), 1631(d)(1), and 1631(e)(1) of the *Social Security Act (Act)* require individuals receiving or applying for Social Security Disability Insurance (SSDI) or Supplemental Security Income (SSI) to provide medical and other evidence of their disability. These sections of the *Act* grant the Social Security Administration (SSA) the authority to establish procedures for collecting and verifying this evidence. Sections 20 CFR 404.1512 and 416.912 of the *Code of Federal Regulations* provide detailed requirements for the types of evidence Social Security disability claimants and beneficiaries must provide showing how their impairments affect their ability to work (e.g., evidence of age; education and training; work experience; daily activities; efforts to work). SSA uses Form SSA-3373, Function Report-Adult, to collect the information for adult disability cases.

2. Description of Collection

As background to this information collection, individuals who receive or apply for SSDI or SSI must provide the medical evidence and other proof that SSA requires to establish their disability. After completion of the initial application form, which is covered under 0960-0618 (iClaim or the SSA-16) for SSDI applicants and 0960-0229 (SSA-8000) or 0960-0444 (SSA-8001, an abbreviated version of the SSA-8000) for SSI claimants, SSA typically asks respondents to complete a series of additional forms to begin developing the necessary evidence. One of these forms is the disability report (SSA-3368 or SSA-3367 for adults, or the SSA-3820 for children), which are covered under OMB Control No.s 0960-0579 and 0960-0577, respectively. The disability report helps SSA understand the claimant's medical conditions, medical treatments (including sources of potential medical evidence), and other relevant information, such as work activity, job history, education and training, and vocational rehabilitation. When claimants apply in person, a Field Office (FO) technician typically collects the disability report during the initial visit; when claimants apply online, they complete the disability report electronically.

This information collection, the Function Report for adults (SSA-3373), specifically develops evidence related to the claimant's self-reported ability to function and perform activities of daily living. Although the form is not required in all cases, claimants completed it in about 50% of cases during the period from Fiscal Year(FY) 2023 to FY 2025. In most circumstances, claimants do not complete the form during their initial visit to a field office. Instead, after a field office forwards the initial application and disability report to the State Disability Determination Services (DDS) for development and adjudication, DDS mails the form to the claimant for completion. If the claimant requires assistance, the DDS may collect the information by phone. To modernize and simplify

the process, at the beginning of FY 2026, SSA implemented an electronic version of the form that claimants can complete and submit online through SSA's Upload Documents Portal (OMB No. 0960-0830), providing an online service option as an alternative to mailing, faxing, or bringing the form to an SSA field office or DDS office.

If the claimant does not complete and return the form, the DDS determines whether the information we collect on Form SSA-3373 is necessary to make a disability determination for the claim. In some cases, the DDS is able to determine the claimant is disabled based on medical and non-medical evidence already obtained through the initial application or the Disability Report. In such cases, the DDS makes a determination without a Function Report.

However, more often, the DDS determines that they need the information from the SSA-3373 to adjudicate the claim and attempts to collect the information by phone if the claimant has not returned a completed form. During this phone interview, the claimant may submit responses to this form as well as other information collections the DDS identified as required, such as a Work History Report, SSA-3369-BK (OMB No. 0960-0578). In addition, the DDS may also provide additional forms from the Disability Case Processing System (OMB No. 0960-0555) to collect impairment-specific information. In certain circumstances, the SSA field office collects the information during the initial application. If the interviewer judges that recontact with the applicant will be difficult (for example, if the applicant is homeless, hard to reach by telephone, or unavailable for contact), or if the claimant asks to have the forms completed by an interviewer, demonstrates concern or apprehension about their ability to complete the forms, or the interviewer suspects the claimant will be unable to complete the forms properly, then the field office technician completes the form during the initial application through a personal interview process.

In addition to initial applications, SSA follows these processes to collect this information, if necessary, when determining whether an individual's disability continues in redeterminations at age 18, and in continuing disability reviews (CDR, OMB No. 0960-0072).

This information collection covers instances when a claimant completes the Function Report on their own behalf. In certain circumstances, DDS determines that it needs additional information to fully evaluate a claimant's limitations in the ability to function and will ask a third party to complete a Function Report about the claimant, SSA-3380 (OMB No. 0960-0635). The DDS sometimes seeks this information from sources who have observed the claimant over a long period, are knowledgeable about the claimant's current day-to-day functioning, and can compare this to the claimant's premorbid functioning, if relevant. Examples include educational personnel, public and private social welfare agency personnel, family members, caregivers, friends, neighbors, employers, and clergy. The DDS prefers people who either live with the claimant or are in close contact with the claimant.

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

Psychological Cost:

- **Requirement for Program:** The SSA-3373 includes several sections and questions that may require claimants to reflect on and describe limitations, challenges, or changes in their abilities due to their medical condition, particularly regarding activities such as personal care, mobility, meal preparation, and participation in social activities.
- **Psychological Cost:** Due to the lengthy and detailed questions on the SSA-3373, the respondents, who are already coping with health challenges, may become overwhelmed. Claimants may feel stressed about providing accurate information, fearing that incomplete or incorrect answers could affect their eligibility for benefits. Some questions require claimants to disclose information about mental health, personal care, or social functioning, which may cause discomfort. Individuals with cognitive impairments, mental health conditions, or fatigue may find the process of recalling and documenting detailed information exhausting and discouraging. These factors may cause disability claimants and beneficiaries to experience stress and either delay completing the form or abandon it altogether.

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 adult Title II and Title XVI claimants, or current recipients undergoing redeterminations of benefits.

3. Use of Information Technology to Collect the Information

Form SSA-3373 is available as a fillable PDF on SSA's website, which the respondent can complete, print, and mail to SSA. The DDS also mails the form to the respondent to complete and return. Also, in an effort to modernize and make this process easier for claimants, beginning in FY 2026, SSA added 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 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.

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.

In other collection instruments, we ask general questions related to the information in this collection, such as requesting details about the medical conditions that limit your ability to work (SSA-3368, OMB Control No. 0960-0579). However, because this collection seeks more specific information about how a claimant's medical conditions affect individual activities and functional abilities, it does not duplicate information gathered elsewhere.

In addition, as mentioned above, we also collect similar information from third parties using the SSA-3380 (OMB No. 0960-0635). While the SSA-3380 includes similar questions to the SSA-3373, these questions are posed from the perspective of a third party respondent, and, therefore, does not provide the same information as the self-reported SSA-3373. Therefore, we need both forms to better adjudicate a claim.

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 collect this information, we would be unable to adjudicate many new claims for disability benefits or make determinations on continuing eligibility for benefits, leaving us unable to fulfill our mandate to make payments to those who are disabled. Because we ask the respondents to complete the form only once for an initial adult claim for benefits, and occasionally again in the case of a continuing disability review or appeal, we cannot collect the information 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 July 31, 2026, at 91 FR 48470, and we received no public comments. The 30-day FRN published on September 24, 2026, at 91 FR 60677. If we receive any comments in response to this Notice, we will forward them to OMB. We did not consult with the public about 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 or Teleservice Centers (minutes)**	Total Annual Opportunity Cost (dollars) ***
SSA-3373 (paper, personal interview, or Upload Documents webform) ⁺	1,812,929	1	61	1,843,144	\$ 14.27 *	11**	\$31,044,585***

⁺ Our current management information data does not show any difference in burden per response based on method of completion. In addition, as we only recently implemented the Upload Documents webform version of the SSA-3373 in August 2026, we do not have any management information data showing a decrease in burden for using the conversational tone dynamic pathing option. Once we have data showing any difference between the current paper or personal interview options and Upload Documents, we will submit a Change Request to OMB with the updated burden data.

* We based this figure on the average disability payments(\$14.27) reflecting SSA's current FY 2026 data ([Effect of COLA on Average Social Security Benefits](#)).

** We based this 11-minute figure on the average combined August 2026 wait times for field offices (21 minutes, as captured by management information data and posted on our public-facing website ([Social Security performance | SSA](#)), and for teleservice centers (1 minute, which represents the average time it takes for a call to be picked up automatically by our systems and then routed to an SSA technician; this figure also comes from management information data). As the figures fluctuate, the actual wait times may differ slightly from the averages reported here. We update these figures periodically to reflect the most accurate available data. While we included an in-office wait time for the paper form, we note that respondents who mail in the form do not experience any wait times.

*** 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 information collection.**

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)****
1,812,929	1	30	906,465	\$12,935,256****

****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)*****
1,812,929	1	5	151,077	\$2,155,869*****

*****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 **61** 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 **1,843,144** burden hours (reflecting SSA management information data), which results in an associated theoretical (not actual) opportunity cost financial burden of **\$46,135,710**. 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 **\$21,919,234**. 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	1,120
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	\$21,914,988
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	\$3,126
Quantifiable IT Costs	Any additional IT costs	\$0*
Total		\$21,919,234

* We have inserted a \$0 amount for cost factors that do not apply to this collection.

** We do not track this data any longer, as we no longer require the DDSs to report distribution or shipping costs as a budget line item. In addition, since these costs vary per DDS, we cannot accurately speculate the percentage of the overall distribution and shipping costs from the overall budget reports from the DDSs.

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, the State DDSs often do bulk mailings and cannot track the cost for a single mailing. In addition, it is difficult for us to break down the cost for processing a single form, as DDS 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 1,763,546 hours. However, we are currently reporting a burden of **1,843,144** hours. The increase in burden is due to an increase in the number of responses from 1,734,635 to 1,812,929. These figures represent current Management Information data, and show normal fluctuation in the use of this form.

*Note: The total burden reflected in ROCIS is **3,233,057**, while the burden cited in #12 of the Supporting Statement is **1,843,144**. This discrepancy is because the ROCIS burden reflects the following components: field office waiting time + telephone call system wait times + a rough estimate of a 30-minute, one-way, drive burden. 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.