Addendum to the Supporting Statement for Form HA-4608,
Waiver of Your Right to Personal Appearance Before a Judge
20 CFR 404.948(b)(1)(i), 404.956, 416.1448(b)(1)(i), and 416.1456
OMB No. 0960-0284

Revisions to the Collection Instruments

Paper HA-4608:

We are making the following revisions to the paper HA-4608.

- **Change #1**: We are removing reference to "Office of Hearings Operations" on the form cover letter.

  Justification #1: We are removing due to agency reorganization, the "Office of Hearings Operations" name is no longer applicable.

- **Change #2**: We are adding language to inform the claimant they may also complete and submit Form HA-4608 using SSA's Upload Documents Portal (OMB 0960-0830)

  Justification #2: The Upload Documents Portal allows respondents to complete and submit online, which will save time for both respondents and hearing office employees.

We will implement these revisions upon OMB's approval. These revisions do not affect the current burden for this information collection.

Public Comments on the Information Collection

60-Day Comment Period Federal Register Notice (FRN):
The 60-day Comment Period began on August 27, 2026, and ended on October 26, 2026, at 11:59pm. We received public comments on the 60-Day Comment Period FRN from **1** commenter. We acknowledge and appreciate the thoughtful feedback from the commenter, and we responded to the comments below:

- **Comment #1**:
  The commenter suggests that SSA should explain its valuation methodology. The commenter opines that several collections use average disability benefit payments as an hourly proxy for the opportunity cost of respondents' time, while another averages disability payments and worker wages. The commenter also states that a benefit amount is not itself an hourly wage. Therefore, the commenter requests SSA disclose the calculations and explain why these figures reasonably measure the opportunity cost of time for the populations concerned.

SSA Response #1:
The Paperwork Reduction Act of 1995 requires federal agencies to associate both time and monetary costs experienced by the public when accessing essential public benefit programs. To that end, OMB published a memo, M-22-10, *Improving Access to Public Benefits Programs Through the Paperwork Reduction Act,* which requires agencies to include theoretical cost burdens for information collections which only have associated time burdens. The concept here is that "time is money," so agencies should quantify the burden estimate with a theoretical monetary cost on the public.

- **Comment #2**:
  The commenter requests that SSA substantiate the 5-minute burden for the HA-4608 and explain whether this estimate accounts for reading the form, understanding the consequences of waiving an appearance, and making an informed decision. In addition, the commenter suggests that SSA confirm that the form adequately explains the right being waived and that the process protects voluntary and informed choice.

  SSA Response #2:
  As per the information in #12 of the Supporting Statement, we base our time estimates on management information (MI) data for the average response time, which includes 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). Per our current MI data, 5 minutes is the average response time.

  Note: since we account for the learning costs under a separate OMB Number for the HA-501, Request for Hearing by Administrative Law Judge (0960-0269), we do not account for the learning cost time in this 5-minute estimate.

  Finally, the HA-4608 requires the respondent to verify that they have been advised of their right to appear before a judge, and requests the respondent explains why he or she has chosen to waive that right. Therefore, we ensure that respondents adequately understand the right they are waiving and that the process protects their voluntary and informed choice.