

October 26, 2026

Office of Management and Budget
Attn: Desk Officer for SSA

Social Security Administration, OLCA
Attn: Reports Clearance Director
Mail Stop 3253 Altmeyer
6401 Security Blvd.
Baltimore, MD 21235

Re: Docket No. SSA-2026-0991–91 FR 55421(August 27, 2026).

Dear OMB and SSA:

We write on behalf of our group, the National Coalition of Social Security and Supplemental Security Income Advocates, a coalition of more than five hundred advocates from nonprofit legal services organizations, as well as some aging or disability advocacy organizations nationally, with particular expertise in the work of the Social Security Administration (SSA).

In response to our request for the OMB clearance package, SSA staff provided us with draft copies of the following updated forms: Form SSA-8010–BK, SSA-4565, and Form SSA-451.

We have the following concerns and questions about several of the proposed changes outlined in these Agency Information Collection Activities (Docket No. SSA-2026-0958, published at 91 FR 55418 (August 27, 2026)).

Numbered sections below correspond to the numbered sections as published in the Federal Register.

1. Statement of Income and Resources (SSA-8010-BK)

The draft SSA-8010-BK is dense and confusing. While we have not assessed the readability score for this form, its length, density, and use of terms of art (e.g., “federally administered State supplementation under title XVI of the Social Security Act”; “life estates or ownership interest in an unprobated estate”) suggest that the school level is high school graduate or higher.

We suggest that SSA redraft and break up this form into separate pieces that will be shorter and more understandable. For example, SSA should create separate income and resource forms for sponsors of a noncitizen (SSA uses the term “alien”), spouses of a sponsor, and essential persons. Limiting the

SSA-8010-BK to an individual seeking SSI, the spouse of that individual, or the parent for children under the age of 18 would simplify the form and lead to more complete answers.

In addition, we urge SSA to utilize information it has to pre-populate this form before sending it to individuals. For example, we assume that SSA has access to information from other governmental databases about public income maintenance payments received by an individual seeking SSI, the spouse of that individual, or the parent for children under the age of 18. Because of this, SSA could simplify this form to merely ask if any of the payments have been received. Indeed, we assume that SSA will check for other payments regardless of how this form is completed. As written, the form is dense, leading to less accurate reporting.

Third, question no. 3 regarding wages is formatted confusingly. As with public income maintenance payments, SSA has access to other government databases to document wages.

Fourth, the questions regarding public income maintenance payments (no. 3) and other income, including federal and state/local benefits (no. 5), could be combined. Also, the formatting used in question no. 5(a), which simply asks yes/on questions about receipt of different types of income, is much clearer and will allow SSA staff to identify income issues that require follow-up.

Fifth, question no. 6 regarding resources need not request information about the estimated current market value or tax assessed value. Most individuals will not have this information, and SSA would confirm any information provided.

3. Request for Change in Time/Place of Disability Hearing (SSA-769)

Form SSA-769 is used by claimants and representatives to request a change of time or location of a scheduled disability hearing.

There are several changes that SSA should consider making to make Form SSA-769 clearer and more accessible for claimants. First, under the section titled "Hearing Currently Scheduled", SSA should consider revising the "place" subsection. Many claimants have hearings that occur via phone or video. To minimize confusion for claimants filling out this form, there should be an additional prompt in this section for claimants to note whether the hearing is scheduled via phone, video, or in person. Then, if the claimant notes that the hearing is in person, there should be an additional text box where claimants can put the address where their hearing will be held, if known.

Further, SSA should consider revising the section titled "request". The current form has two options for claimants to choose: either "a postentitlement of ____ days from the scheduled hearing date" and/or "a different place of hearing (specify place)". The first option, as currently written, includes technical language that could cause confusion for claimants, especially those with cognitive limitations. A revision of this option to "change in hearing date" would make this option clearer and less confusing for claimants. The second option, as currently written, could potentially cause confusion for claimants

who are requesting that their hearing be changed to or from a phone or video hearing. To address this concern, SSA should consider revising the section to reflect "a different place of hearing (specify place, including a phone or video hearing)." These changes would minimize confusion for claimants filling out the form, decrease the time claimants spend completing the form, and minimize the time SSA staff spend following up with claimants if the form is filled out incorrectly.

Lastly, SSA suggests that it takes eight minutes to complete the Form SSA-769. It likely takes claimants longer than eight minutes to complete this form because claimants would need to gather necessary information about their representative, the current hearing date, and the reason for the request. Additionally, the section "request" as currently written is confusing and inaccessible, as discussed in the paragraph above. Claimants would therefore need additional time to obtain assistance completing this form with SSA or another third party. Accordingly, it would likely take claimants longer than eight minutes to complete this form.

4. Marital Relationship Questionnaire (SSA-4178)

SSA estimates that it takes an average of 5 minutes to complete Form SSA-4178, Marital Relationship Questionnaire, across all formats. SSA states that this form is used "to determine if unrelated individuals of the opposite sex who live together are presenting themselves as husband and wife." This underestimates the time required to complete this highly personal form. Further, the practical utility of form SSA-4178 is limited because field office staff do not always accept it as sufficient evidence, and because it does not capture other use cases or cultural contexts.

SSA's estimate of 5 minutes does not account for the nature of SSA-4178. While the form is relatively short and straightforward, it addresses a sensitive, complex topic. Individuals may find it difficult or confusing to define a relationship and typically do not understand the implications of doing so. The section "Further Explanation of Relationship" allows for further detail but provides no guidance. As a result, completing the form may take up to 20 minutes, or an average of at least 10 minutes.

Further, the practical utility of Form SSA-4178 is limited because field office staff do not always follow guidance on when the form constitutes satisfactory evidence. Per POMS SI 00501.152, the form is used only if there is evidence to the contrary when an individual denies holding out as married, and staff must stop development if the responses do not indicate a marital relationship. However, staff routinely do not stop development: they may not accept an individual's allegation, express suspicion of the responses, and require the individual to disprove any evidence to the contrary. This reduces the utility of the form and increases the burden on both individuals and the field office. To address this, SSA could reinforce this guidance by including it on the form itself or providing additional training.

Additionally, the form does not consider that it may be used by individuals who do not live together in response to an allegation of a "holding out" relationship. In these cases, the individuals' residence is the controlling factor, which is not reflected on the form. SSA could address this by adding a question

explicitly asking respondents whether they live together, or by adjusting question 5 to capture this information.

Finally, the form does not consider that the concept and language of marital relationships may differ across cultures. In some cultures, such as some Hispanic communities, individuals who do not consider themselves to be married may colloquially refer to one another as spouses. Limited English proficiency (LEP) individuals may be unable to accurately express the nature of their relationships or be misunderstood. As respondents may have a different concept of marriage and are unlikely to know the implications of their word choice, this may result in inequitable treatment across cultures.

Because we believe SSA has underestimated the time burden of form SSA-4178, and because the utility of the form is limited by current practices, we recommend additional studies be conducted to ascertain its true administrative burden and identify revisions that would increase its utility.

6. Pain Report Child (SSA-3371-BK)

We have no comments regarding the Pain Report Child form. However, an average burden per response of 15 minutes seems too short to complete this form.

8. Work Incentives Planning and Assistance Program (SSA-4565 and SSA-4566)

We have no comments regarding the draft Help Line Incentives Planning and Assistance (WIPA) Referral and WIPA intake form (Form SSA-4565). While the estimate of eight minutes to complete fields 1-20 seems reasonable, the estimate of 1 minute to complete fields 21-63 seems too low. Fields 21-63 require documentation of demographic data, benefits received, educational history and goals, employment history and goals, and employment since entitlement. Fully completing this section will take 45-60 minutes.

Conclusion

For the reasons set forth above, we urge SSA to amend its estimates on completion time as well as alter relevant forms and procedures consistent with our comments.

Sincerely,

Makayla Harrison
Daryn Fogeron
Jennifer Burdick
Community Legal Services of Philadelphia

Amy Marinacci

Thomas Yates
Legal Council for Health Justice