

Addendum to Supporting Statement for Form SSA-4178
Marital Relationship Questionnaire
20 CFR 416.1826
OMB No. 0960-0460

Minor Revisions to the Collection Instruments

SSA is making the following revisions:

- **Change #1:** We are revising the PRA statement on this form.

Justification #1: We are revising the PRA statement to reflect our current boilerplate language. The current language, which dates back to the last reprint of the form, is now outdated.

Terms of Clearance

OMB placed the following Terms of Clearance on this Information Collection when they last approved it on 10/13/23:

The agency made clarifying edits to the Supporting Statement A. Prior to renewal, the agency will ensure that this form can be signed electronically

- **Term #1: The agency made clarifying edits to the Supporting Statement A.**

SSA response #1: We made clarifying edits to the Supporting Statement A in 2023 and have retained them for this renewal.

- **Term #2: Prior to renewal, the agency will ensure that this form can be signed electronically.**

SSA response #2: SSA now allows the form to be signed electronically. In addition, we also created 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, electronically sign it, 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.

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 2 commenters, one of which is the National Coalition of Social Security and Supplemental

Security Income Advocates. We acknowledge and appreciate the thoughtful feedback from the commenters, and we responded to the comments below:

Comments on the Marital Relationship Questionnaire (SSA-4178):

- **Comment #1:**

The National Coalition of Social Security and Supplemental Security Income Advocates opines that SSA's estimated 5-minute completion time underestimates the burden of completing this highly personal form, and that the current time estimate does not account of the nature of the SSA-4178. The commenter also suggests that completing the SSA-4178 may take at least 10 minutes or up to 20 minutes to complete.

SSA Response #1:

We based our average time burden per response on current management information (MI) data based on SSA technician feedback and routine collection activities for this form. We acknowledge the sensitivity of the questions in the Psychological Costs section of our Supporting Statement, however, since our current MI data reflects the average completion time as 5 minutes, we believe this is accurate at this time. We will revisit the time estimates the next time we renew the approval on this form, or the next time we make revisions.

- **Comment #2:**

The National Coalition of Social Security and Supplemental Security Income Advocates notes that the "Further Explanation of Relationship" section does not provide any guidance, and that individuals may find it difficult or confusing to define a relationship and typically do not understand the implications of doing so.

SSA Response #2:

SSA is committed to making our forms as clear and user-friendly as possible. The information requested on this form is basic, relates to an individual's relationship with another person who resides with them. While we consider this information collection low burden, SSA does not ask an individual to complete the SSA-4178 without first speaking with a claim technician, who explains the purpose of the form and why SSA needs the information.

- **Comment #3:**

The National Coalition of Social Security and Supplemental Security Income Advocates suggests that the practical utility of the form is limited because the field office staff do not always accept it as sufficient evidence, and it does not capture other use cases or cultural contexts. In addition, the commenter believes that Form SSA-4178's utility is limited because field office staff do not consistently follow POMS SI 00501.152 guidance on when the form constitutes satisfactory evidence. The commentor notes that although staff should stop development when responses do not indicate a marital relationship, the technician may continue questioning individuals' statements and require them to disprove contrary evidence.

This practice increases the burden on individuals and field offices. The commenter recommends reinforcing the guidance on the form or through additional staff training.

SSA Response #3:

Thank you for the recommendation to provide additional training on the policy for this form. We will share this recommendation with the appropriate SSA component for training. In addition, we thank the National Coalition of Social Security and Supplemental Security Income Advocates for feedback on the practical utility of this form. While we acknowledge that we require additional evidence to help determine marital status, we believe that the SSA-4178 is still helpful in this context. In the future we will consider reviewing this form in terms of other use cases or cultural contexts to see where we may enhance the utility of this form.

- **Comment #4:**

The National Coalition of Social Security and Supplemental Security Income Advocates states that Form SSA-4178 does not account for individuals who do not live together but are alleged to have a “holding out” relationship. Because residence is a controlling factor in these cases, the commenter recommends adding a question about whether the individuals live together or revising question 5 to capture this information.

SSA Response #4:

SSA only uses the SSA-4178 to determine when two unrelated individuals living in the same household are considered married for supplemental security income (SSI) purposes. SSA would not ask individuals living in separate households to fill out this form.

- **Comment #5:**

The National Coalition of Social Security and Supplemental Security Income Advocates states that Form SSA-4178 does not account for cultural differences in how marital relationships are understood and described. Individuals, including those with limited English proficiency (LEP), may use terms such as “spouse” differently or struggle to accurately describe their relationships, potentially resulting in inequitable treatment across cultures.

SSA Response #5:

SSA uses the SSA-4178 to determine if two unrelated individuals who live in the same household are considered married for SSI purposes; telling others in their community they are married, verbally or in writing is one indicator SSA considers in making this determination. We understand that there may be other cultural factors, and will consider these when we next review this form.

- **Comment #6:**

The National Coalition of Social Security and Supplemental Security Income Advocates recommends additional studies to accurately assess Form SSA-4178's administrative time burden and identify revisions to improve its utility, noting their belief that SSA has underestimated completion time and that current practices limit the form's effectiveness.

SSA Response #6:

We thank the National Coalition of Social Security and Supplemental Security Income Advocates for the recommendation to conduct additional studies for this form. We will share this recommendation with the appropriate SSA component.

- **Comment #7:**

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 #7:

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.

For SSA, in most cases the respondents for our information collections are no longer paid an hourly wage. Rather, SSA pays the respondents either in retirement benefits, or in disability payments. OMB agreed that since applicants or recipients of SSI or SSDI no longer receive an hourly wage, but receive disability payments from SSA, that SSA may use the average hourly disability payment as a theoretical hourly cost amount for these information collections. Since the respondents are applicants for SSI or SSDI Payments, we use the average hourly disability payment in lieu of an hourly wage for these respondents. We calculate the hourly theoretical wage amount for disability payments using SSA's management information (MI) data which shows the average monthly wages for disability recipients, and then we divide that amount by 160 (hours) to determine the hourly theoretical (not actual) wage amount. We increase that amount as needed annually based on new annual figures from SSA's MI data (which is publicly available).

- **Comment #8:**

The commenter opines that SSA explain its treatment of wait times, specifically the wait time of 21 minutes in a field office for the SSA-4178 for all respondents using the paper form, while acknowledging that individuals who drop off completed forms experience no wait time. The commenter requests that SSA disclose the underlying assumptions regarding this estimate and distinguish actual burden attributable to other completion methods.

SSA Response #8:

As we explain in the Supporting Statement, SSA does not maintain MI data on the SSA-4178 regarding how the respondents submit the paper forms, rather, our data only tracks the type of submission (paper form, SSI Claim System/Consolidated Claim System, or Upload Documents). Since we do not have data on how many paper submission are submitted via mail or as completed forms, we cannot account for those submissions separately from the paper forms completed in field offices with the help of a technician (but not through a personal interview process). To ensure we are still accounting for in-office wait times for our paper submissions, we include the average wait time figure from our public-facing website ([Social Security performance | SSA](#)) for all paper submissions in our burden chart. To better account for the lack of MI data, we added language under the chart to explain this in the Supporting Statement.