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

A. Justification

1. Introduction/Authoring Laws and Regulations

Section *1631(e)* of the *Social Security Act (Act*) *Act* and section *20 CFR 416.1826* of the *Code of Federal Regulations* authorizes the Social Security Administration (SSA) to collect the information as necessary on Form SSA-4178, Marital Relationship Questionnaire, to ensure only eligible individuals (or eligible spouses) receive Supplementation Security Income (SSI) payments, and that they receive the correct amount of payments.

2. Description of Collection

During the SSI application or redetermination process, an SSA technician obtains information regarding the claimant's marital status, living arrangement, and relationship with an individual with whom the claimant resides. If the claimant is not legally married but lives with another person, the technician may ask whether the claimant and the other individual represents themselves to others as married. If the claimant indicates that he or she does not represent themselves as married and there is no information to the contrary, SSA may not need any additional development. However, if the information the claimant provides, or other available evidence raises a question regarding whether the individuals represent themselves as married, the technician informs the claimant they need to complete and submit Form SSA-4178, Marital Relationship Questionnaire to SSA during an interview, or the technician mails the claimant the SSA-4178 with a prepaid envelope to send back to SSA. If the claimant fails to submit the SSA-4178 to SSA, this could result in a delay in processing or denial of benefits since determining whether a marital relationship exists is necessary for SSI eligibility and computation of benefits.

SSA uses Form SSA-4178, to collect information necessary to determine if two unrelated individuals of the opposite sex who live together are presenting themselves as husband and wife. The information we collect on Form SSA-4178 helps SSA determine whether the individuals should be considered married for purposes of determining SSI eligibility and the amount of the SSI payment. For example, the form asks about how the individuals refer to or introduce each other and whether they are identified as spouses on documents or records. Claimants can receive the SSA-4178 by mail, online through Upload Documents (OMB No. 0960-0830), or provide the information directly to SSA during an in-office interview. During an in-office interview the technician inputs the information into either the SSI Claim System or the Consolidated Claims Experience (CCE) system.

When SSA receives the completed SSA-4178 form, a technician reviews the information to determine if the couple is presenting themselves as married and records the decision in the claimant's records.

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

Psychological Cost #1:

- **Requirement for Program:** The SSA-4178 asks individuals to provide information about shared bills and how they present to others so SSA can determine marital status.
- **Psychological Cost:** Respondents may find these questions unduly invasive, and these factors can lead to individuals choosing to delay or abandon completing this form. However, this information is necessary to ensure payment eligibility under the SSI program.

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 applicants for, and recipients of, SSI payments.

3. Use of Information Technology to Collect the Information

Form SSA-4178 is available for the claimant to download, complete, and mail to SSA or the claimant can provide the information directly to SSA during an in-office interview. For the in-office interviews, an SSA agent either directly transcribes the responses into the Intranet SSI Claim System, or the CCE system or records them on an electronic PDF version of the SSA-4178 that the agency hosts on SSA's Intranet forms system, which are scanned or recorded in SSA's internal Enterprise Content Management Architecture and Evidence systems which are the back-end data storage systems.

This collection also has 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. 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.

This collection does not currently have a fully public-facing Internet version, as we prioritized other information collections for full electronic conversions. Given that IT Mod programming is an ongoing, dynamic project, we cannot provide specific timelines for when we will be able to make any particular ICR available via Internet web-based application. We will ultimately convert most existing ICRs to full electronic versions depending on how they fall within our overall IT Mod schema, but this may be

unconnected to the PRA approval lifecycle.

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.

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 use Form SSA-4178, SSA's would fail to conduct timely reviews of questionable marital relationships, which could result in overpayments to claimants or recipients. Because we collect this information on an as needed basis, we cannot collect it less frequently. There are no legal or technical obstacles to prevent 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 August 27, 2026, at 91 FR 55421, and we received public comments from a 1 commenter. Please see the Addendum for the summary of the public comments and SSA's responses. The 30-day FRN published on October 29, 2026, at 91 FR 68213. If we receive any comments in response to this Notice, we will forward them to OMB. We did not consult with the public for the development of or any revisions to 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 (minutes)**	Total Annual Opportunity Cost (dollars) ***
SSA-4178 (Paper)	3,331[+]	1	5	278	$14.27*	19**	$19,022***
Technician Interview (SSI Claim System/ CCE)	7,226	1	5	602	$14.27*	19**	$41,240***
SSA-4178 (Upload Documents)	426	1	5	36	$14.27*	N/A	$514***
Totals	**10,983**			**916**			**$60,776*** **

[+] Our current management information (MI) data does not distinguish between submissions via paper form which respondents mail in or drop off and paper forms which respondents complete in a field office with a technician. Rather, we only distinguish between paper submissions, SSI Claim System/CCE submissions, and Upload Documents submissions. Therefore, we account for the burden regarding all paper form submissions together and include the in-office wait time for all paper submissions. However, as noted below, respondents who mail in or drop off their completed forms experience no wait times.

* We based this figure on disability payments ($14.27), based on SSA's current management information data (Effect of COLA on Average Social Security Benefits).

** We based this figure on the average FY 2026 wait time for field offices (19 minutes), captured by SSA's current management information data. This figure is also posted on our public-facing website (Social Security performance | SSA). As the figures fluctuate, the wait times may be different on the website than they appear here. While we have included wait time for all respondents who complete the paper form, we note that respondents are not required to complete the form in person, and those who mail or drop off a completed form do not experience any wait time.

*** 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)****
7,226	1	30	3,613	$51,558****

****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)*****
10,983	1	5	915	$13,057*****

*****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 **5** 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 **916** burden hours (reflecting SSA management information data), which results in an associated theoretical (not actual) opportunity cost financial burden of **$125,391**. 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 **$71,972**. 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	$257
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	$22,890
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	$48,825
Quantifiable IT Costs	Any additional IT costs	$0*
Total		**$71,972**

* 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 do not 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, we 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 field office and State Disability Determination Services 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 the this ICR in 2023, the burden was 425 hours. However, we are currently reporting a burden of 916 hours. The increase is due to the number of respondents SSA requests to complete the SSA-4178. These figures represent current Management Information data. Although the number of responses changed, SSA did not take any action to cause this change.

*Note: The total burden reflected in ROCIS is **7,901**, while the burden cited in #12 of the Supporting Statement is **916**. This discrepancy is because the ROCIS burden reflects the following components: field office waiting time + telephone call system wait times + learning costs + 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. <u>Collections of Information Employing Statistical Methods</u>

SSA does not use statistical methods for this information collection.