

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.

■ [REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]



#### **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.

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

## **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