

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.

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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