

Supporting Statement for Form SSA-8010-BK
Statement of Income and Resources
20 CFR 416.207, 416.301-416.310, 416.704, and 416.708
OMB No. 0960-0124

A. Justification

1. Introduction/Authoring Laws and Regulations

The Social Security Administration (SSA) is required to establish and verify the amount of earned and unearned income, as well as resources available to individuals who are applying for or receiving Supplemental Security Income (SSI). This process may also include income and resources of SSI-ineligible parents, spouses, essential persons (i.e., certain persons who were converted from state welfare rolls in 1974, currently fewer than 100 nationwide), and in some cases, certain aliens and their sponsor(s). SSA collects this information using Form SSA-8010-BK. The authority for SSA to collect this information is found in 42 U.S.C. 1382; sections 1612(a), 1613(a), 1614(f), 1621, and 1631(e) of the *Social Security Act*; and in the *Code of Federal Regulations* Sections 20 CFR 416.207, 416.301-310, 416.704, and 416.708.

2. Description of Collection

SSA collects information about income and resources for Supplemental Security Income (SSI) claims and redeterminations on Form SSA-8010-BK from third party individuals (e.g., parents, spouses, guardians, or other individuals typically in the role of representative payee) who support the SSI applicant or recipient. SSA deems (i.e., consider another person's) income instead of determining the amount of support and maintenance furnished in cash or in kind by a deemor. SSA deems instead of applying the value of the one-third reduction (VTR), when the individual resides in the household of another (i.e., the deemor's household) and receives support and maintenance in kind. SSA uses the information from the SSA-8010-BK to make initial or continuing eligibility determinations for SSI claimants or recipients who are subject to deeming.

When SSA determines that we need Form SSA-8010-BK for an applicant or recipient's record, we contact the respondent (typically a parent or spouse of the applicant or recipient) and schedule either an in-person or telephone interview to collect the required information. The respondents do not usually complete the form independently, rather, to make things easier for the parent or spouse, an SSA interviewer assists the respondent with completing the form.

Respondents learn about the SSI program through several channels:

- **SSA Outreach**

The SSA provides information about SSI through its official website, brochures, and public information campaigns. Local SSA offices also offer in-person assistance and informational materials.

- **Community Organizations**

Nonprofit organizations, advocacy groups, and social service agencies often help individuals understand SSI eligibility and application processes. These organizations may host informational sessions or provide one-on-one guidance.

- **Healthcare Providers and Social Workers**
Medical professionals, hospital social workers, and case managers frequently inform eligible individuals about SSI, especially those with disabilities or limited income.
- **Word of Mouth**
Friends, family members, or others who have experience with SSI may share information about the program.
- **Online Resources**
Many applicants find information through online searches, government websites, and reputable third-party resources that explain SSI benefits and application procedures.
- **Schools and Educational Institutions**
For children with disabilities, school counselors or special education staff may inform families about SSI as a potential resource.

We identified the following psychological cost based on the requirement for this information collection:

Psychological Cost:

- **Requirement for the Program:**
Field office technicians use the form to collect and verify income and resources from individuals whose income and resources may be deemed (considered available) to the SSI applicant or recipient. We only use Form SSA-8010 when the applicant or recipient has an ineligible spouse or parent(s) on their record and these individuals could affect the applicant's or recipient's SSI eligibility.
- **Psychological Cost:**
Some individuals may experience anxiety related to SSI reporting requirements. This includes anxiety about providing sensitive information such as income and resources when their income is deemed to an applicant or recipient.

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 third party individuals who support SSI claimants or recipients, and whose income and resources SSA may deem (consider to be available as their own) to SSI applicants or recipients.

3. Use of Information Technology to Collect the Information

We collect information using both the paper version of this form and electronically during in-person or telephone interviews through SSA's intranet SSI Claims system. Based on our data, approximately 97% of respondents under this OMB number complete this form through an in-person or telephone interview.

This collection 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 the in-person interview, 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. The agency is currently working on implementing a dynamic pathing, conversational tone version of the SSA-8010 through Upload Documents. When we finalize the screens for the conversational tone dynamic pathing webform, we will submit it through a Change Request to OMB for approval.

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

SSA collects information about income and resources using several forms. However, the specific nature of the information we collect and the methods we use to collect it prevent duplication. SSA does not use another collection instrument to obtain similar data from individuals whose income is subject to deeming, other than an SSI-ineligible spouse.

Forms SSA-8000-BK (OMB Control No. 0960-0229) and SSA-8203-BK (OMB Control No. 0960 0416) request similar as well as additional information from an SSI applicant or recipient and their SSI-ineligible spouse. However, SSA uses Form SSA-8010-BK to request income and resource information from individuals other than the claimant and the claimant's spouse when we need this information to determine SSI eligibility or continuing SSI eligibility (for example, the parent(s) of an SSI-ineligible child).

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 collect this information, or chose to collect it less frequently, it could result

in improper SSI payments. Although we require affected individuals to report changes in their circumstances, SSA must also collect this information through other methods, such as periodic SSI eligibility determinations (typically conducted annually). There are no technical or legal obstacles to 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 no public comments. 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 revision of 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 or Teleservice Centers (minutes)**	Total Annual Opportunity Cost (dollars) ***
SSA-8010-BK (Intranet)	1,855,340	1	20	618,447	\$33.54*	11**	\$32,151,209***
SSA-8010-BK (Paper)	61,380	1	20	20,460	\$33.54*	11**	\$1,063,654***
Totals	1,916,720			638,907			\$33,214,863***

* We based this figure on an average U.S. citizen's hourly salary (\$33.54), as reported by Bureau of Labor Statistics data (Occupational Employment and Wage

Statistics).

****** We based this 11-minute figure on average October 2026 wait times (specifically, the arithmetic mean of a 20-minute field-office wait time and a 1-minute wait time for a call to be picked up automatically by our systems and then routed to an SSA technician. Both the 20-minute and 1-minute figures are themselves averages captured by management information data and posted on our public-facing website, [Social Security performance | SSA](#). As the figures fluctuate, the actual wait times may differ slightly from the averages reported here. We will update these figures periodically to reflect the most accurate available data.

******* 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.**

We did not include a specific learning cost for this form, as we included the burden for learning about this information collection within the overall 20 minute burden for completing the form listed in the chart above.

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)****
1,916,720 ⁺	1	30	958,360	\$32,143,394****

⁺ We included the full number of respondents when calculating the travel costs; however, we note that respondents may choose to conduct the interview via telephone rather than come into a field office; or respondents may choose to fill out the form on their own and drop it off (rather than complete the form in person with a technician). Even so, our current management information (MI) data does not distinguish between respondents who travel to a field office and those who choose to complete the form via telephone interview, so we accounted for travel time for all respondents.

****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 base our burden estimates on current MI 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 **20** 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 MI data, the current burden information we provided is accurate. The total burden for this ICR is **638,907** burden hours (reflecting SSA management information data), which results in an associated theoretical (not actual) opportunity cost financial burden of **\$65,358,257**. 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 **\$20,125,385**. 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	\$8,108
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	\$19,531,377
Full-Time Equivalent Costs	Out of pocket costs + Other expenses for providing this service	\$0*
Systems Development,	GS-9 employee x man hours	\$585,900

Updating, and Maintenance	for development, updating, maintenance	
Quantifiable IT Costs	Any additional IT costs	\$0*
Total		\$20,125,385

* We have inserted a \$0 amount for cost factors that do not apply to this collection.

SSA is unable to break down the costs to the Federal government further than we already have. 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 last cleared this ICR in 2023, the burden was **958,360** hours. However, we are currently reporting a burden of **638,907** hours. This decrease in burden is due to an overall decrease in burden per response as per our current management information (MI) data. While the number of respondents has remained the same, our MI data has shown that respondents take on average 20 minutes to complete this form with a technician. Therefore, these figures represent current MI data.

*Note: The total burden reflected in ROCIS is **1,948,665**, while the burden cited in #12 of the Supporting Statement is **638,907**. This discrepancy is because the ROCIS burden also reflects the following components: field office/teleservice waiting time + 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

For the paper version of the SSA-8010-BK, we will not publish the OMB approval expiration date. SSA has received an exemption from OMB that allows us to omit the exemption date from our program forms. SSA produces millions of public-use forms, many of which have life cycles that exceed the duration of OMB approval. Since SSA does not routinely revise and reprint these forms (such as on an annual basis), the exemption prevents the unnecessary destruction of otherwise useable forms with expired OMB approval dates, thereby avoiding Government waste.

For the Intranet version of Form SSA-8010-BK (SSI Claims System, and the Upload Documents version), SSA is not requesting an exception and will display the OMB approval expiration date as required.

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. Collections of Information Employing Statistical Methods

SSA does not use statistical methods for this information collection.