November 23, 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-2026-1090–91 FR 60685 (September 24, 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).

We have the following concerns and questions about several of the proposed changes set forth in these Agency Information Collection Activities (Docket No. SSA-2026-1090, published at 91 FR 60685 (September 24, 2026). Numbered sections below correspond to the numbered sections as published in the Federal Register.

4. Child Relationship Statement (SSA-2519)

Form SSA-2519 (02-2024) could be improved to make it clearer and easier for individuals to complete. For example, the form uses the terms Wage Earner and Worker interchangeably. We suggest that SSA be consistent and use one descriptor–either Wage Earner or Worker–throughout the form. It is confusing to use both terms; individuals may think there is a difference between the two terms. In the comments below, we use "worker" instead of "wage earner."

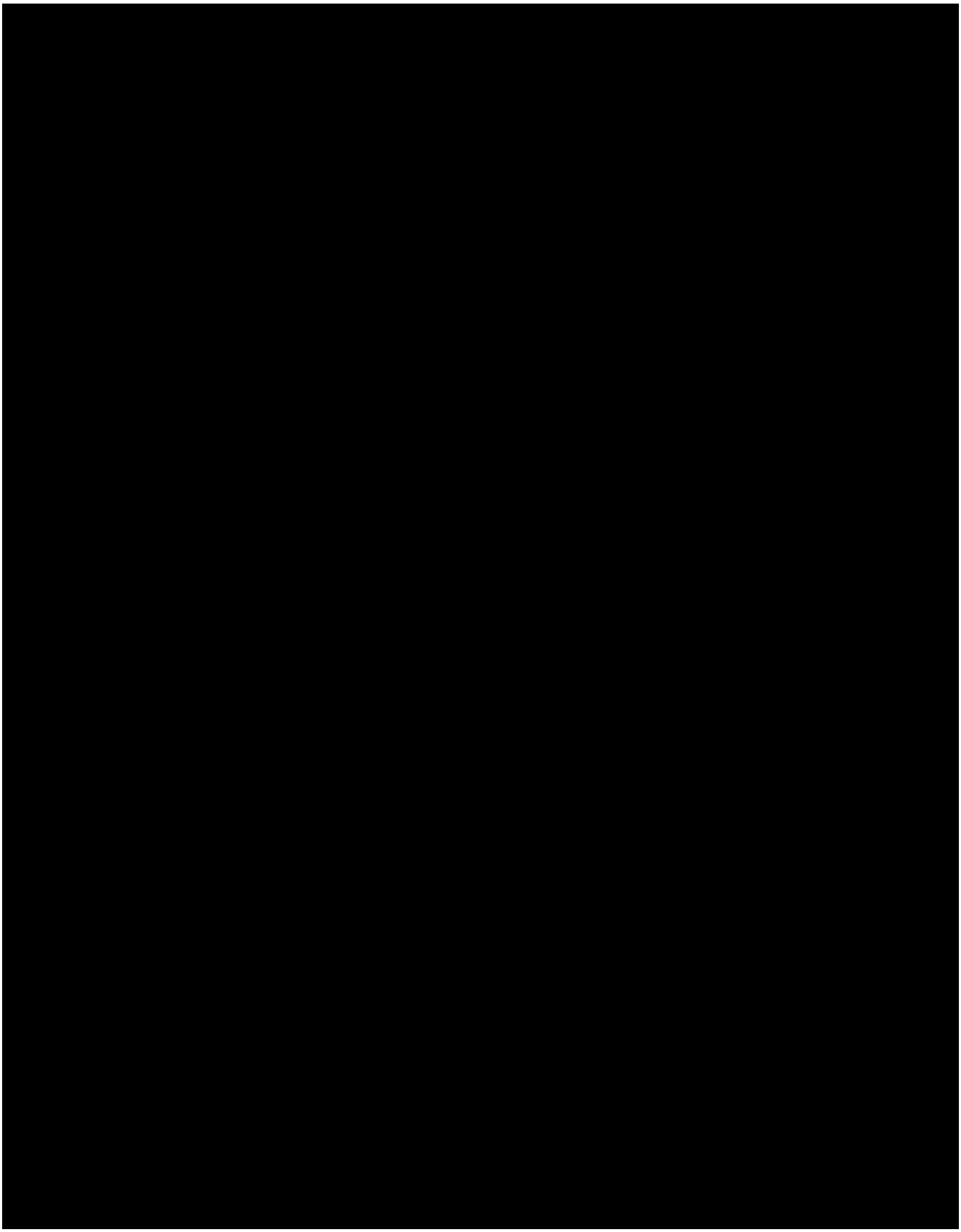
In addition, the form's questions should be reworded for clarity. For example, the first two questions seek information on whether the worker was decreed by a court to be the child's parent or ordered to contribute to the child's support. If the answer to no. 1 is yes, the form instructs to omit items 2, 3, and 4. If the answer to no. 2 is yes, the form instructs that nos. 3 and 4 be omitted. Using no. 1 as an example, SSA should reword this to state, "If "YES", do not answer questions 2, 3, and 4.

In question no. 3, SSA should add a third category, "Don't Know," in addition to Yes and No, because someone other than the worker could complete the form. Limiting responses to Yes or No could lead to incorrect responses.

Because question no. 5 (FOR DISTRICT OFFICE USE ONLY), asks for State of Domicile, the form should ask the State in which the worker currently resides if alive, or was residing in at the time of death.

Finally, SSA's average burden per response of 15 minutes seems too low, particularly in cases in which the worker was not decreed by a court to be the child's parent or ordered to contribute to the child's support. The form asks for extensive documentation in such cases.

[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,

Amy Marinacci
Thomas Yates
Legal Council for Health Justice