Justification for De Minimis Changes for Form SSA-1694
Request for Business Entity Taxpayer Information
OMB No. 0960-0731

Background

On July 4, 2025, Congress enacted changes to the tax reporting threshold, impacting the reporting requirements for payments made to representatives. We updated Form SSA-1694 (Entity Registration and Tax Information) to reflect the threshold revisions, and OMB approved these required revisions on July 31, 2025, through a full OMB approval process. In July 2026, the Internal Revenue Service (IRS) provided additional guidance regarding Form 1099 (1099-NEC and 1099-MISC) reporting thresholds beginning tax year 2026 and forward for future tax years for the direct payment of fees to appointed representatives who registered with us.

To ensure Form SSA-1694 remains accurate and up to date, we are requesting approval to implement minor, De Minimis revisions reflecting these legislative changes. These updates do not alter the form's appearance, do not affect respondent burden, and do not require the Office of Management and Budget's (OMB) approval prior to implementation, as prompt adoption of these revisions will ensure compliance with current legislative requirements. Even so, we are submitting these De Minimis changes to OMB for approval to remain in compliance with the PRA.

Revisions to the Information Collection

- **Change #1:** We are revising the language on page 1, Paragraph 2, Sentence 1, concerning the change to the tax reporting payment threshold amount.

    - **Current Language:** We are required to file an informational return (i.e., Form IRS 1099-MISC or 1099-NEC) with the Internal Revenue Service (IRS) when we make payments of a specified amount or more during a tax year ($600 in 2025, $2,000 in 2026, and thereafter the amount will be adjusted annually for inflation) to a representative or to a business entity in a calendar year.

    - **Revised Language:** We are required to file an informational return (i.e., Form IRS 1099-MISC or 1099-NEC) with the Internal Revenue Service (IRS) when we make payments of a specified amount or more during a tax year to a representative or to a business entity.

  Justification #1: We are updating the instructions for Form SSA-1694 to reflect changes to the tax-reporting threshold for information reported on Forms 1099-NEC and 1099-MISC, enacted by Congress through the One Big Beautiful Bill Act (OBBBA), effective July 4, 2025, and subsequent IRS guidance issued in July 2026.

- **Change #2**: We are adding two sentences on page 1, paragraph 2 to clarify changes to the tax-reporting threshold addressed in subsequent IRS guidance issued in July 2026.

    - Current Language: None

    - Revised Language: The reporting threshold for Form 1099-NEC is $600 in 2025 and $2,000 in 2026. For Form 1099-MISC the reporting threshold is $600 in 2025 and 2026. Beginning in 2027, the threshold for both Form 1099-NEC and Form 1099-MISC will be adjusted for inflation.

  Justification #2: We are adding language to update the instructions on Form SSA-1694 to reflect changes to the tax-reporting threshold enacted by Congress through the OBBBA, effective July 4, 2025, and subsequent IRS guidance issued in July 2026.

- **Change #3**: We are revising the language on page 1, Section 2, Sentence 2: Tax Mailing Address

    - **Current Language:** We will mail Form IRS 1099-MISC or 1099-NEC to this address if payments of a specified amount or more are made during a tax year ($600 in 2025, $2,000 in 2026) to the entity or to representatives associated with your business entity in a calendar year.

    - **Revised Language**: We will mail Form IRS 1099-MISC or 1099-NEC to this address if payments of a specified amount or more are made during a tax year to the entity or to representatives associated with your business entity in a calendar year.

  Justification #3: We are updating the instructions for Form SSA-1694 to reflect changes to the tax-reporting threshold for information reported on Forms 1099-NEC and 1099-MISC, enacted by Congress through the OBBBA, effective July 4, 2025, and subsequent IRS guidance issued in July 2026.

  These changes will not affect the public reporting burden.

Justification for Resubmission of the Information Collection Within a Year of Approval

We are making the changes within a year of the OMB approval date due to Congressional changes to the tax reporting threshold that occurred while the previous version was pending with OMB. We are requesting to make these updates now, while staff is revising the form based on the previous OMB approval, to ensure the information provided is accurate.