

Supporting Statement for Form SSA-1693 and e1693
Fee Agreement for Representation before the Social Security Administration
OMB No. 0960-0810

A. Justification

1. Introduction/ authoring Laws and Regulations

The *Social Security Act (Act)* requires any person who represents a claimant before the agency, and wants to receive a fee for services, to obtain the Social Security Administration's (SSA) authorization of the fee. One way to request the necessary fee authorization is to complete and submit a fee agreement using our standard Form SSA-1693 (Fee Agreement for Representation Before the Social Security Administration). Sections 206(a), (b) and 1631(d) of the *Act* provide SSA the legal authority to request this information on the SSA-1693.

2. Description of Collection

SSA requires all representatives to register with SSA before accepting an appointment by filing Form SSA-1699, Representative Registration (OMB No. 0960-0732). By registering these individuals, SSA: (1) authenticates and authorizes them to do business with us; (2) allows them to access our records for the claimants they represent; (3) facilitates direct payment of authorized fees to appointed representatives; and (4) collects the information we need to meet Internal Revenue Service (IRS) requirements to issue specific IRS forms if we pay an appointed representative in excess of a specific amount (\$600). Once SSA processes the registration, SSA sends the appointed representative a Representative ID. Representatives find out about registration process on SSA's website at www.socialsecurity.gov/ar, or by contacting SSA at 1-800-772-1213.

When an SSA approved representative wants to charge the claimant a fee for services related to their claims, SSA requires the representative to obtain the claimants approval, by submitting form SSA-1693, Fee Agreement for Representation before the Social Security Administration, to SSA. SSA then telephones the claimant to verify the signature and intent to sign the form verbally. Once verified, SSA completes processing the paper form.

SSA uses form SSA-1693 when a representative or claimant submits or submitted a notice of appointment on a pending claim, matter, or issue with SSA. In addition, SSA requires a representative or claimant to file the SSA-1693 before SSA issues a favorable determination or decision in your case. If SSA receives the SSA-1693 after SSA's determination or decision, SSA disapproves the fee agreement. Under a fee agreement, claimants pay the lesser of 25 percent of past-due benefits or the amount SSA sets. Claimants also cover any court-approved fees and out-of-pocket expenses, such as costs for copies of medical records. Claimants and representatives find out about the fees, fee processes, and SSA's rules on SSA's website at www.ssa.gov/representation. The claimant and representative complete and sign the form SSA-1693 and submit it to SSA.

Representatives currently use fee agreements that vary in length, content, and complexity, and this frequently causes delays in the approval process. Use of Form SSA-1693 is voluntary for the representatives; however, when they choose to use the form, SSA requires them to complete all of the sections to ensure SSA has all the information necessary to authorize a fee under the fee agreement process. There are no psychological cost associated with the SSA-1693.

The respondents are the representatives who help claimants through the application process, and the claimants they represent.

3. Use of Information Technology to Collect the Information

Form SSA-1693 is available on SSA's website as a fillable PDF which respondents can print, sign in pen-and-ink, and submit via mail, fax, eFax, or uploaded in our portals as described above, or file in-person.

This collection has a public-facing fillable and submittable PDF version which utilizes *Adobe Sign* technology to accept and process an electronic signature (eSignature). The online submittable version mirrors the paper version and provides respondents with an online service option as an alternative to mailing, faxing, or bringing the form to an SSA field office. The respondents initiate the online version from our website and complete, electronically sign, and submit it online using the *Adobe Sign* web application. Use of the *Adobe Sign* web application does not present any added burden on respondents, nor does it require respondents to download and install the application locally on their device or pay any subscription or licensing fees. Respondents enter their responses into structured data fields on the screens within the *Adobe* platform by following a secure link that *Adobe Sign* sends to the email address the respondent provides. The respondent receives an email from *Adobe Sign* with instructions for how to access, complete, eSign, and submit the form using this online service. Upon submission, the online submittable version of the form electronically transmits an image of the completed form to the Electronic Viewing System (eVIEW) for SSA technicians to process.

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**
The nature of the information we collect and the way we collect it preclude duplication. SSA does not use another collection instrument to obtain similar data.
5. **Minimizing Burden on Small Respondents**
This collection does not place any additional burden on small businesses or small entities.
6. **Consequence of Not Collecting Information or Collecting it Less Frequently**
SSA uses the information collected on the SSA-1693 and e1693 to authorize fees for appointed representatives. If we did not collect this information, we could not authorize fees using the fee agreement process. We only need to collect this information once, and as the statute requires, the case decision-maker will decide on the fee agreement at the time of the favorable decision. 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 in a manner inconsistent with 5 *CFR* 1320.5.
8. **Solicitation of Public Comments and Other Consultations with the Public**
The 60-day advance Federal Register Notice published on July 21, 2025, at 90 FR 34327, and we received no public comments. The 30-day FRN published on November 24, 2025 at 90 FR 53044. If we receive any comments in response to this Notice, we will forward them to OMB. We did not consult with the public in the revision of this form.
9. **Payment or Gifts to Respondents**
SSA does not provide payments or gifts to the respondents.
10. **Assurance of Confidentiality**
SSA protects the information it collects in accordance with 42 *U.S.C* 1306, 20 *CFR* 401, 5 *U.S.C.* 552a (Privacy Act of 1974) and other applicable Federal law and regulations.
11. **Justification for Sensitive Questions**
The information collection does not contain any questions of a sensitive nature.
12. **Estimates of Public Reporting Burden**

Modality of Completion	Number Of Respondents	Frequency of Response	Average Burden per response	Estimated Total Annual Burden	Average Theoretical Hourly Cost Amount	Average Wait Time in Field Office (minutes)**	Total Annual Opportunity Cost (dollars)***

			(minutes)	(hours)	(dollars)*		
SSA-1693 (paper)	4,225	1	12	845	\$60.26*	16**	\$118,833****
e1693	1,745	1	13	378	\$60.26*		\$22,778****
Written Agreements on Representative's Stationary	1,575,773	1	20	525,257	\$60.26*		\$31,651,987****
Totals	1,581,743			526,480			\$31,793,598****

* We based this figure on the averaged total of the average Lawyer's Legal Services wages, as reported by Bureau of Labor Statistics data, and the average U.S. worker's hourly wages, as reported by Bureau of Labor Statistics data ([Occupational Employment and Wage Statistics](#)).

** We based this figure on the average FY 2026 wait times for field offices (16 minutes), based on SSA's current management information data. This figure reflects the data posted on our public facing website ([800 number performance | SSA](#)) on the date we drafted this notice. As the figures fluctuate daily, the wait times may be different on the publication date of this notice. While we are including this theoretical cost, respondents typically choose to mail or fax the paper form rather than deliver the form in person to a field office.

** This figure does not represent actual costs that SSA is imposing on recipients of Social Security payments to complete this application; rather, these are theoretical opportunity costs for the additional time respondents will spend to complete the application. **There is no actual charge to respondents to complete the application.**

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)*****
2,480	1	30	1,240	\$74,722*****

****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 calculated the following Learning Cost time burden based on the estimated time and effort we expect respondents will take to learn about this program, its applicability to their circumstances, and to cover any additional research we believe respondents may need to take to understand how to comply with the program requirements (beyond reading the instructions on the collection instrument):

Total Number of Respondents	Frequency of Response	Estimate Learning Cost (minutes)	Estimated Total Annual Burden (hours)	Total Annual Learning Cost (dollars)*****
5,970	1	5	498	\$30,009*****

We base our burden estimates above on current management information 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 **12, 13 and 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 management information data, the current burden information we provided is accurate. The total burden for this ICR is **4208** burden hours (reflecting SSA management information data), which results in an associated

theoretical (not actual) opportunity cost financial burden of **\$31,898,329**. SSA does not charge respondents to complete our applications.

13. Annual Cost to the User (Others)

This collection does not impose a known cost burden on the users.

14. Annual Cost to Federal Government

The annual cost to the Federal Government is approximately \$52,952. 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	\$800
Distributing, 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	\$49,200
Full-Time Equivalent Costs	Out of pocket costs + Other expenses for providing this service	\$0*
Systems Development, Updating, and Maintenance	GS-9 employee x man hours for development, updating, maintenance	\$2,952
Quantifiable IT Costs	Any additional IT costs	\$0*
Total		\$52,952

* 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. First, since we work with almost every US citizen, we often do bulk mailings and cannot track the cost for a single mailing. In addition, 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 per respondent. As well, 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 IC in 2022, the burden was 356,816 hours. However, we are currently reporting a burden of 526,480 hours. This change stems from an

increase in completion time for the e1693 from 12 minutes to 13 minutes to allow additional time for representatives or claimants to navigate and submit the online version. In addition there is an increase in burden, due to the increased number of written agreements submitted by representatives.

* **Note:** The total burden reflected in ROCIS is **529,866**, while the burden cited in #12 of the Supporting Statement is **526,480**. This discrepancy is because the ROCIS burden reflects the following components: field office waiting time + a rough estimate of a 30-minute, one-way, drive burden + learning costs. In contrast, the chart in #12 of the Supporting Statement reflects actual burden.

16. Plans for Publication of Information Collection Results

SSA will not publish the results of the information collection.

17. Displaying the OMB Approval Expiration Date

For paper form SSA-1693, we will not publish the OMB approval expiration date. OMB granted SSA an exemption from the requirement to print the OMB expiration date on its program forms. SSA produces millions of public-use forms with life cycles exceeding those of an OMB approval. Since SSA does not periodically revise and reprint its public-use form (e.g., on an annual basis), OMB granted this exemption so SSA would not have to destroy stocks of otherwise useable forms with expired OMB approval dates, avoiding Government waste.

For the **Internet version** of form SSA-1693, SSA is not requesting an exemption to the requirement to display the OMB approval expiration date.

18. Exceptions to Certification Statement

SSA is not requesting an exception to the certification requirements at *5 CFR 1320.9* and related provision at *5 CFR 1320.8(b)(3)*.

B. Collections of Information Employing Statistical Methods

SSA does not use statistical methods for this information collection.