

April 22, 2026

Office of Management and Budget
Attn: Reports Clearance Director Officer for SSA

6401 Security Blvd., Baltimore, MD 21235

Submitted via reginfo.gov.

Re: Agency Information Collection Activity: SSA–2026-0133

To whom it may concern:

Thank you for the opportunity to provide feedback on revisions of OMB approved information collections. This comment is submitted on behalf of the Supplemental Security Income (SSI) Unit of Community Legal Services of Philadelphia (CLS). For sixty years, CLS has assisted clients at every stage of the SSI application process, from initial applications to representation in appeals before the Pennsylvania Bureau of Disability Determination, the Social Security Office of Hearing Operations, and in federal court. More broadly, CLS advocates for policy changes within both Social Security and SSI programs, including by convening two national advocacy workgroups.

Thank you for the opportunity to comment on this proposal.

- **2. Application for Supplemental Security Income**

SSA's finding that completing the paper SSA 8001 takes 15 minutes is an underestimate. In our experience, it is only possible for a claimant to complete this form in 15 minutes in ideal circumstances when the person was able to concentrate and remain free of distractions and if they had no income and resources to report on the form, and they benefit from being assisted by a representative. For many claimants with memory and concentration impairments, this form takes us more than 15 minutes to complete, even when we are helping the claimant complete the form. Without an advocate's help, we believe this would take much longer than 15 minutes. One of the obstacles relates to the form: while the questions seem straightforward to advocates who help people with the form frequently, but for claimants, this form (even the deferred or abbreviated 8001 form) can be daunting and confusing with all the skip patterns and questions that can't always be answered with 100% accuracy given claimant's unique circumstances. Moreover, this estimate does not account for the time an unrepresented claimant spends getting the form to SSA, particularly if they are going to travel to SSA to drop it off.

- **5. Electronic SSDI and SSI Wage Reporting**

SSA should streamline the current process in place for wage reporting. To report wages using the My Social Security online portal or the app, a worker must provide the Employer Identification Number (EIN) for each employer. This has been identified by our claimants, and a ticket-to

work agency we work closely with, as one of the biggest obstacles to reporting wages. In many cases, a worker cannot enter all the new data required for a new employer and the worker must get agency staff involved to input the new employer data in the system. SSA has underestimated the burden (20 minutes a month) because it does not appear that SSA has taken into account the significant amount of time this first step takes, which someone has to do every time they switch jobs. This additional step creates an unnecessary workload for agency staff and significantly reduces the number of workers who use My Social Security to report wages.

Workers who cannot report wages to My Social Security without agency intervention generally resort to faxing in paystubs or bringing them in person to local field offices, thus generating additional paperwork for agency staff.

SSI recipients have limited reporting options and must use either the SSA Mobile Wage Reporting applications (SSAMWR) or the SSI Telephone Wage Reporting System (SSITWR) to report wages. SSA estimates that each response takes individuals about 20 minutes to complete. Many claimants report that the app is glitchy and unable to take their report. This impacts the burden estimate because how do the value the time a claimant wastes when they try to use the app and then it fails?

SSI claimants are also unable to report IREWs/BWES at the same time they report their wages, which is a missed opportunity. Often claimants will forget to follow up with this separate report resulting in inappropriate, and easily avoidable overpayments.

- 8 Request to Show Cause for Failure to Appear

This form is critical: it asks claimants to identify why they missed their hearing. Whether their hearing is rescheduled hinges entirely on their response, which SSA has solicited in an open-ended way. While we appreciate that this form is short and concise, we also know that the concept of “good cause” is complicated and may not be understood by many claimants—particularly those who are pro se or have cognitive deficits. We would recommend adding several check boxes with common issues that cause people to miss a hearing that are relevant to the good cause determination such as:

- I did not ever receive notice of the hearing
- I got sick and could not come

In addition to the open ended question already in the form.

Respectfully submitted,

Jennifer Burdick, Community Legal Services.