

**NATIONAL ORGANIZATION OF
SOCIAL SECURITY CLAIMANTS' REPRESENTATIVES
(NOSSCR)**

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Executive Director
Barbara Silverstone

April 23, 2021

Social Security Administration,
OLCA, Attn: Reports Clearance Director
3100 West High Rise
6401 Security Blvd.
Baltimore, MD 21235

RE: Docket ID Number SSA-2021-0007

Submitted via [regulations.gov](https://www.regulations.gov)

Dear Madam or Sir,

These comments are submitted on behalf of the National Organization of Social Security Claimants' Representatives (NOSSCR), a specialized bar association for attorneys and advocates who represent Social Security Disability Insurance (SSDI) and Supplemental Security Income (SSI) claimants throughout the adjudication process and in federal court.

NOSSCR members frequently assist their clients with form HA-4631, Claimant's Recent Medical Treatment. Although SSA plans to only revise the Paperwork Reduction Act and Privacy Act statements on this information collection, we recommend the agency make three additional changes to the paper and electronic versions of this form.

First, we recommend that the form move current question 3 above questions 1 and 2, first asking about hospitalizations and then about other treatment by doctors and other medical providers. Since people are generally treated by doctors in a hospital, respondents can be confused by the current order of questions and list treatment by a doctor in a hospital in question 1.

Second, the form should clarify what is meant by "have you been hospitalized" in current question 3: does hospitalization require admission or an overnight stay (in which case, where should emergency room visits and outpatient treatment be listed?) or does it include all treatment that occurs in a hospital?

Third, the form should ask not just for treatment by doctors, but by other acceptable medical sources recognized in SSA's regulations: certified nurse midwives and certified registered nurse anesthetists, nurse practitioners, and clinical nurse specialists (collectively, Advance Practice

Registered Nurses); licensed psychologists, optometrists, podiatrists, physicians' assistants, and audiologists; and qualified speech-language pathologists.

These changes are likely to enhance the quality, utility, and clarity of the information collected and minimize the burden on respondents.

Thank you for your consideration of these comments.

Sincerely,

A handwritten signature in black ink, appearing to read "Barbara Silverstone". The signature is fluid and cursive, with the first name "Barbara" written in a larger, more prominent script than the last name "Silverstone".

Barbara Silverstone

Executive Director