## Supporting Statement for Form SSA-2506-BK Psychiatric Review Technique 20 CFR 404.1520a & 416.920a OMB #0960-0413

## A. Justification

- 1. In accordance with 20 CFR 404.1520a and 416.920a of the Code of Federal Regulations, the Disability Determination Services (DDSs) administering the Title II (Disability Insurance) and Title XVI (Supplemental Security Insurance) programs are required to evaluate the severity of mental impairments. Form SSA-2506-BK was developed to meet this requirement.
- 2. The Social Security Administration (SSA) needs this evaluation of severity to assist in the adjudication of claims involving mental impairments. The information collected on this form helps to: (1) identify the need for additional evidence for the determination of impairment severity; (2) consider aspects of the mental impairment relevant to the individual's ability to work; and (3) organize and present the findings in a clear, concise, and consistent manner. The respondents are State DDSs and Federal DDSs administering the Title II and Title XVI programs.
- 3. Improved information technology that reduces the burden became available electronically under the AeDib paperless process in January 2004. In addition, many of the DDSs have this form on their case processing systems. Approximately 80% of the forms are collected electronically through the AeDib program. However, hard copies of the form are available to all components.
- 4. The nature of the information being collected and the manner in which it is collected preclude duplication. There is no other collection instrument used by SSA that collects data similar to that collected here.
- 5. This collection does not have a significant impact on a substantial number of small businesses or other small entities.
- 6. Use of Form SSA-2506-BK ensures accuracy of the DDSs' decisions that involve mental impairments. Collection of this information is mandatory and cannot be collected less frequently than once for each claim involving a mental impairment. Failure to complete the form, as required in the Regulations cited in Item 1 above, will result in a decrease in the accuracy of decisions, with a concomitant increase in erroneous benefit outlay. In addition, failure to obtain the information will preclude the required eligibility reviews and the proper determinations of disability. There are no technical or legal obstacles that prevent burden reduction.
- 7. There are no special circumstances that would cause this information collection to be conducted in a manner that is not consistent with 5 CFR 1320.5.

- 8. The 60-day advance Federal Register Notice was published on May 26, 2006 at 71 FR 30464, and SSA has received no public comments. The second Notice was published on July 31, 2006, at 71 FR 43270. There have been no outside consultations with members of the public.
- 9. SSA provides no payment or gifts to the respondents.
- 10. The information requested is protected and held confidential in accordance with 42 U.S.C. 1306, 20 CFR 401 and 402, 5 U.S.C. 552 (Freedom of Information Act), 5 U.S.C. 552a (Privacy Act of 1974) and OMB Circular No. A-130.
- 11. The information collection does not contain any questions of a sensitive nature.
- 12. Form SSA-2506-BK will be used by 52 respondents (DDSs), which will process approximately 20,595 responses each for a total of 1,070,940 responses annually. The estimated average response time is 15 minutes, for a total of 267,735 burden hours. The total burden is reflected as burden hours, and no separate cost burden has been calculated.
- 13. There is no known cost burden to the respondents. SSA reimburses the DDSs 100 percent of their costs for completing the form. See Item 14 below.
- 14. The estimated annual cost to the Federal Government as a result of this form is \$23,839,631. This is based on 267,735 hours of medical consultant time at \$88.72 per hour (which translates into a cost of \$23,753,449.20), plus a cost of approximately \$86,181.52 for printing the form. The cost for the AeDib electronic version is currently unknown and is still being developed.
- 15. The decrease in burden hours was a result of recalculating the incidence of mental disability claims based on current 2005 fiscal year statistical data.
- 16. The results of the information collection will not be published.
- 17. OMB has granted SSA an exemption from the requirement that the expiration date for OMB approval be printed on its program forms. SSA produces millions of public-use forms, many of which have a life cycle longer than that of an OMB approval. SSA does not periodically revise and reprint its public-use forms (e.g., on an annual basis). This exemption was granted so that otherwise useable editions of forms would not be taken out of circulation because the expiration date had been reached. In addition, Government waste has been avoided because stocks of forms will not have to be destroyed and reprinted.
- 18. SSA is not requesting an exception to the certification requirements at 5 CFR 1320.9 and related provisions at 5 CFR 1320.8(b)(3).

## B. Collections of Information Employing Statistical Methods

Statistical methods are not used for this information collection.