

**Supporting Statement for the
Disability Report-Child (SSA-3820-BK; i3820)**

20 CFR 416.912

OMB No. 0960-0577

A. Justification

1. **Authoring Laws and Regulations** - *Sections 205(a) and 1631(d)(1) of the Act*, as amended (*the Act*), provide the Commissioner with full power and authority to make rules and regulations, establish procedures, and to adopt reasonable and proper rules for the nature and extent of the evidence needed, as well as the methods of taking and furnishing the same, to evaluate the alleged disability. *Sections 223 (d)(5)(A) and 1631(e)(1) of the Act* provide that claimants have to furnish such medical and other evidence as the Commissioner may require to prove that they are disabled. Implementing disability regulations at *20 CFR 416.912* specifically state, among other things, that an individual is to furnish medical evidence and, if asked, evidence of age, education and training, work experience, efforts to work, and any other evidence showing how his or her impairment(s) affects their ability to work.
2. **How, by Whom and for What Purpose the Information is to be Used** - The Social Security Administration (SSA) uses the Disability Report – Child to collect some of the information specified in the regulations and to provide applicants/claimants (and ultimately interviewers) with the means to record information about the child’s condition, treating sources and/or other medical sources, and educational sources.

The State Disability Determination Services (DDS) evaluators use the information collected on the Disability Report – Child to develop medical and school evidence and to assess the alleged disability. The information, together with medical evidence, forms the evidentiary basis upon which the initial disability evaluation process is founded.

3. **Use of Information Technology to Collect the Information** - In addition to the traditional paper form SSA-3820-BK, SSA has developed an online version of the form, called the Child Disability Report (i3820). Applicants complete the i3820 online using a personal computer. The i3820 is automated, allowing respondents to provide information about a child by completing a series of screens, which are then submitted electronically to SSA. Applicants print and mail or take the notification page to their local Social Security field office (FO). The notification page serves as a back-up alert to FOs that an internet disability report has been transmitted. Applicants also print, sign, and date approximately five SSA-827s, Authorization for Source to Release Information to the Social Security Administration.

The Electronic Disability Collect System (EDCS) is an internal collection process. Using EDCS, FO employees key information provided by applicants or their representatives onto EDCS screens, which establish a data base that the adjudicating component can access.

Both the i3820 and EDCS screens have been designed to capture the same information as the revised paper version of the SSA-3820.

4. **Why Duplicate Information Cannot Be Used** - 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. **How Burden on Small Respondents is Minimized** - This collection does not have a significant impact on a substantial number of small businesses or other small entities.
6. **Consequence of Not Collecting Information or Collecting it Less Frequently** - If the information were not collected, SSA could not discharge its mandate to determine whether the claimants were disabled. Generally, an applicant completes the form only once, while filing his or her initial disability claim. There are no technical or legal obstacles that prevent burden reduction.
7. **Special Circumstances that Need to be Explained** - There are no special circumstances that would cause an information collection to be conducted inconsistent with 5 CFR 1320.5.
8. **Solicitation of Public Comment and Other Consultations with the Public** - The first Federal Register notice was published on April 23, 2007 at 72 FR 20154. The second notice was published on June 13, 2007 at 72 FR 32697. We received no public comments concerning these notices. There have been no outside consultations with members of the public.
9. **Payment or Gifts to Respondents** - SSA provides no payment or gifts to the respondents.
10. **Assurances of Confidentiality** - 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.

In addition, information collected by SSA is protected by our Privacy Policy for Internet Services that ensures the confidentiality of all information provided by the requester. Our Internet privacy policy is:

- You do not need to give us personal information to visit our site.

- We collect personally identifiable information (name, SSN, DOB, or E-mail) only if specifically and knowingly provided by you.
- Personal identifying information you provide will be used only in conjunction with services you request as described at the point of collection.
- We sometimes perform statistical analysis of user behavior in order to measure customer interest in the various areas of our site. We will disclose this information to third parties only in aggregate form.
- We do not give, sell, or transfer any personal information to a third party.

Additionally, SSA will ensure the confidentiality of the requester’s personal information in several ways:

- All electronic requests are encrypted using the Secure Socket Layer (SSL) security protocol. SSL encryption prevents a third party from reading the transmitted data even if intercepted. This protocol is an industry standard, and is used by banks such as Wells Fargo and Bank of America for Internet banking.
- The requester is given adequate warnings that the Internet is an open system, and there is no absolute guarantee that others will not intercept and decrypt the personal information they have entered. They are advised of alternative methods of providing personal information, i.e., visit to a field office or a call to the 800 number to speak with a representative.
- Only upon verification of identity is the requester allowed access to additional Internet applications that allow requests and changes to personal information from SSA records.

11. **Justification for Sensitive Questions** - The information collection does not contain any questions of a sensitive nature.

12. **Estimates of Public Reporting Burden** - The following is an estimate of the annual burden hours for this collection of information:

Collection Format	Number of Respondents	Frequency of Responses	Average Burden per Responses (Hours)	Estimated Annual Burden (Hours)
SSA-3820 (Paper Form)	500	1	1	500
Electronic Disability Collection System (EDCS)	422,000	1	34 minutes	239,133
i3820 (Internet)	39,500	1	2	79,000
Totals	462,000			318,633

The Respondent Type category for all estimated annual burden hours is “Individuals or Households.”

The number of respondents for EDCS is the estimated number of applicants who either complete the paper SSA-3820 or provide information directly to an FO interviewer who keys it into EDCS. A small number of paper forms are not entered into EDCS because there are a few claims that are excluded from EDCS processing. Almost 100% of all responses are collected electronically. Over the past 3 years, the number of individuals who choose to complete the i3820 has increased substantially, and the number of EDCS exclusions have decreased.

Annual Cost to the Respondents (Salary) - The total burden is reflected as burden hours, and no separate cost burden has been calculated.

13. **Annual Cost to the Respondents (Other)** - There is no known cost burden to the respondents for the paper or EDCS versions
14. **Annual Cost to Federal Government** - The annual cost to the Federal government is approximately \$10,761,616. This estimate includes a projection of the costs for printing and distributing the paper form and for collecting the information. It also includes the cost of FO personnel keying SSA-3820 information into EDCS. This latter estimate was derived by taking 34 minutes (the average time it takes the FO to key the SSA-3820 into EDCS) times the hourly cost of \$44.88 (\$44.88 divided by 60 minutes equal \$.75 a minute) times 422,000 responses.

The estimated cost to the Federal Government to collect the information for the Internet form is negligible. Because the cost of maintaining the system which collects this information is accounted for within the cost of maintaining all of SSA's automated systems, it is not possible

15. **Program Changes or Adjustments to the Information Collection Budget** - The public reporting burden has changed since the last request for clearance due to a more accurate estimate of the annual childhood application rate, which is lower than previously reported; an increase in the number of Internet-completed forms; a decrease in paper completion; and a more accurate burden per response for 3820s keyed into EDCS.
16. **Plans for Publication of Results of Information Collection** - The results of the information collection will not be published.
17. **Request Not to Display OMB Expiration Date** - 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 clearance. 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. We are not, however, requesting a waiver of

the requirement to display the expiration date of the OMB approval on i3820 screens.

18. **Exceptions to Certification Statement** - 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. **Collection of Information Employing Statistical Methods**

Statistical methods are not used for this information collection.