<u>Statement of Explanation of the Change in Burden Estimate for i3441 (Electronic Disability Report)</u>

We are proposing a change to the burden estimate for the i3441 and revising the language for the Welcome screen.

The burden hours for the i3441 were estimated over four years ago. When the form was first posted on the Internet, data regarding completion time was not available. Although log files captured data on actual completion times, we never used that data to update the estimates. There was no public comment on the estimate, and nobody questioned it. Based on a recent analysis of the i3341 activity log files, we have determined that the average completion time is actually 30 minutes.

To get a gauge on user experience with the i3441, SSA contacted two large organizations and three individuals who are experienced completing the i3441. Based on our survey questions, they estimated that it takes between 30 and 40 minutes to conduct an interview and complete the i3441. These responses are validated by i3441 activity log file data collected by SSA over a period of 11 days. The activity logs show that users take an average of 30 minutes to complete and submit the i3441.

The majority of the users of this form are professional organizations who are familiar with the electronic form; therefore, they do not read all of the instructional text or make keying mistakes that require them to revisit pages because of unacceptable entries. We believe that the current burden hour estimate is a more accurate assessment of the time that it takes for the primary users of the system to complete the form. Because this new estimate is nearly identical to the time required to complete the paper form, we do not believe there is a need to present a time comparison to Internet users.

Further, because iAppeals is a seamless process, linking the appeals application (i501 and i561) and the Disability Report (i3441), we are also including the burden for the appeals applications on the Welcome page. Below is the proposed language for the first paragraph of the Welcome page:

Welcome!

This is the starting point to request a review of our medical decision about your eligibility for disability benefits. There are two parts to this Internet Appeal process: (1) an Appeal Request Internet form; and, (2) an Appeal Disability Report that gives us more information about your condition. You can complete both forms online. To appeal online, the only form you are required to submit is an appeal request (Part 1). However, we encourage you to submit an Appeal Disability Report (Part 2) because it will give us more information about you and help us in processing your appeal. We estimate it will take 18 to 20 minutes to complete Part 1 and 30 minutes to complete Part 2. If you do not want to use the Internet to request your appeal, there are Other Ways to Request an Appeal or Complete a Disability Report Attached are the current OMB approved version as well as the proposed language mentioned above.