

### **Supplemental Information on Burden Estimate Change for the i3441**

Below is additional information that explains why we believe that 30 minutes is the average time to complete the report.

OMB requested that we provide an average completion time for both new and experienced users. Our earlier data contained an average of actual usage of 5000 novice and experienced users from live transactions which we are convinced is statistically more accurate than data derived from a small study.

The two hours referenced in the Internet Appeals Report (i3441) was anecdotal and a carry-over from another form (Adult Disability Report, OMB No. 0960-0579) that solicits more detailed information covering a broader time range. It does not accurately reflect the completion time for the i3441 and we were in error to use it as a reference point. We apologize for any confusion this may have caused.

By way of explanation, when a claimant initially applies for disability benefits with SSA and chooses to use our Internet forms, he or she is instructed to complete the Adult Disability Report (i3368/69). If we determine that the claimant is not disabled, the claimant may file an appeal request, and if in doing so uses the Internet, he or she is instructed to complete the Appeal Disability Report (i3441). On the i3441, we ask only for updated information since the claimant last completed a disability report, i.e., the i3368/69. Because claimants must file an appeal request with us within 60 days after the date of receipt of our initial determination notice, the majority of those who are appealing our initial determination will not normally have much to update since the date they had completed the i3368/69. In addition, the i3368/69 collects information on work history, whereas the i3441 does not. For these reasons, it takes less time to complete i3441.

The 30-minute timeframe is our best faith estimate of the average time for all users to complete this electronic form. In some cases it may take more or less time, so we propose to provide a range of 15 to 45 minutes, with an average of 30 minutes, on the iAppeals Welcome page (attached in the ICR documents screen).

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