

**Supporting Statement for Form SSA-1372-BK and SSA-1372-BK-FC,
Advance Notice of Termination of Child's Benefits and
Student's Statement Regarding School Attendance
20 CFR 404.350-404.352, 404.367-404.368
OMB # 0960-0105**

A. Justification

1. If certain conditions are met, *Section 202(d)* of the *Social Security Act* provides for payment of monthly benefits to students who are children of entitled workers. One requirement is that a form that provides information regarding the student's attendance at an educational institution be filed. The information needed to determine student eligibility is described in *20 CFR 404.350, 404.351, 404.352, 404.367 and 404.368* of the *Code of Federal Regulations*.
2. The information collected on Forms SSA-1372-BK and SSA-1372-BK-FC is used by the Social Security Administration (SSA) to determine whether children of an insured worker are eligible for student benefits. The data collected on these forms allow SSA to determine student entitlement and when entitlement will end. The SSA-1372-BK is used for domestic student claimants while the SSA-1372-BK-FC is used for student claimants living and attending school outside the United States. Because there are differences in schooling outside of the United States, SSA created the SSA-1372-BK-FC which asks questions applicable to schooling outside the United States and removes questions which do not apply to schools in foreign countries. However, the two versions of the form do ask the same essential information. The respondents are applicants for student benefits.
3. The SSA-1372 requires wet signatures from both the student and the school official, and the form cannot be used electronically from start to finish. Child beneficiaries who are on the rolls receive the SSA-1372 approximately three months before they turn age 18 so they can complete the form, take it to a school official for certification, and then return the completed form to SSA for review and processing. Since it is the student's choice about the SSA office he/she wants to return the form SSA-1372 to for processing, adding the fax number for a specific SSA office would remove that option from the claimant. Therefore, SSA will not be adding a fax number to the form. The form is available as a non-fillable PDF on SSA's website in case another form is needed for whatever reason (e.g., the student lost all or part of the one SSA gave him/her). SSA has no way to authenticate email addresses, and, therefore, cannot consider an emailed version of the form a wet signature. For the above listed reasons, we are not able to make this form available electronically at this time. SSA will reevaluate the possibility of making an electronic version when new technology is available which would allow both the students and the schools to fill out the form without the possibility of fraud.
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. Collection of this information takes place when a claim is filed for a child's benefits and

the child can only be entitled as a student, or when a child currently entitled to benefits reaches age 18. If this information were not collected, SSA would be unable to determine entitlement to student benefits. Since this information is only collected when the above mentioned situations apply, it cannot be collected less frequently. 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 October 18, 2007 at 72 FR 59133, and SSA has received no public comments. The second Notice was published on January 7, 2008, at 73 FR 1253. There have been no outside consultations with members of the public.

In the First Federal Register Notice, we inadvertently labeled this ICR as an extension. It is, in fact, a revision. Also, in the First Notice, we stated that the burden hours were 36,668; however, ROCIS calculated the burden hours differently and this has been changed to 36,666 (as noted in #12 below). These corrections have been made in the Second Federal Register Notice.

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. Approximately 200,000 respondents, both domestic and those outside the United States, will use Forms SSA-1372-BK and SSA-1372-BK-FC annually. The estimated total average response time is 11 minutes, for a total of 36,666 burden hours.

SSA - 1372 - BK :

Type of Respondent	Number of Respondents	Frequency of Response	Average Burden Per Response (minutes)	Total Annual Burden (hours)
Individuals/ Households	99,850	1	11	18,306
State/ Local/Tribal Government	99,850	1	11	18,306
Totals	199,700			36,612

SSA - 1372 - BK - FC :

Type of Respondent	Number of Respondents	Frequency of Response	Average Burden Per Response (minutes)	Total Annual Burden (hours)
Individuals/	150	1	11	27

Households				
State/ Local/Tribal Government	150	1	11	27
Totals	300			54

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.
14. The annual cost to the Federal Government is approximately \$1,232,000. This estimate is a projection of the costs for printing and distributing the collection instrument and for collecting the information.
15. The increase in the public reporting burden from 33,333 to 36,666 is due to an increase in the average burden per response by one minute. SSA is now asking the respondents to annotate the student's expected graduation date to the page of the form that the school official keeps for future reporting purposes. SSA estimates that it may take up to one minute for the school official to complete that extra step.
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.