Justification for a Non-Substantive Changes to Forms 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

<u>Justification for Non-Substantive Changes to the SSA-1372-BK and SSA-1372-BK-FC</u>

Subsequent to OMB approval of the SSA-1372-BK and SSA-1372-BK-FC, the Social Security Administration reviewed the time estimates for the public burden on these forms and realized that we inaccurately reported these numbers. We noticed that we have been double counting the burden to the public by stating that it takes 11 minutes for the student to fill out the majority of the form and another 11 minutes for the school official to read, sign and file the form. This is not accurate. Rather, it takes the student approximately 8 minutes to read the instructions, gather information and fill out the form; while it only takes about 3 minutes for the school official to review the student's work, sign the form and file it.

In order to avoid confusion to the public, both the students and school officials who complete this form, we want to correct the time estimates to reflect the actual anticipated burden. We want to make the corrections at this time instead of waiting to seek OMB renewal for the collection in order to avoid uncertainty or misunderstanding on the part of the respondents when they complete the form.

We are also making one further revision to the SSA-1372-BK only: we are inserting the Internet address information that already appears on page 4 of the form onto page 3 as well. The Internet address information text reads as follows:

The people in your Social Security office will be glad to help you with any questions concerning this form or any other questions you have about Social Security. **For more information, please see:** www.socialsecurity.gov/schoolofficials/.

Finally, we have one further change for the SSA-1372-BK-FC only: when we last obtained OMB approval for this form we inadvertently neglected to place the action address for OIO at the top of page 5. We are correcting that now. As indicated on the attached mock-up of the form, the address of OIO will read as follows at the top of page 5:

Social Security Administration Office of International Operations P.O Box 17769 Baltimore, MD 21235 USA

Implementation

The agency plans to destroy the existing forms SSA-1372-BK and SSA-1372-BK-FC and use the new versions of these forms in order to update the language on the form as soon as we receive approval for the above revisions. SSA's Forms Management Team will standardize the new versions of these forms upon approval.