

**SUPPORTING STATEMENT FOR THE
DISABILITY REPORT-CHILD (SSA-3820-BK; i3820)
20 CFR 416.912
OMB No. 0960-0577**

A. Justification

1. Introduction/Authorizing 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 require that claimants for Social Security (SSA) benefits furnish such medical and other evidence of disability as the Commissioner may require to prove that they are disabled.

20 CFR 416.912 of the Code of Federal Regulations, 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 the ability to work, or in the case of a child, how the child functions. SSA uses Form SSA-3820-BK, Disability Report-Child to collect this information

2. Description of Collection

The Social Security Administration (SSA) requires claimants to furnish medical and other evidence to prove they are disabled. Form SSA-3820 collects various types of information about a child's condition, his/her treating sources and/or other medical sources of evidence. SSA employees collect this information when claimants file a claim for childhood disability benefits under the Supplemental Security Income (SSI).

The State Disability Determination Services evaluators use the information obtained on the SSA-3820 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 based on. The respondents are claimants seeking childhood disability benefits under the SSI Program.

Applicants can complete the Disability Report-Child Disability using the internet version of Form SSA-3820 (i3820). The i3820 is an automated version of Form SSA-3820, and allows the applicant to provide information about a child by completing a series of screens, which allows the applicant to submit the information electronically to SSA.

Applicants can also complete and print Form SSA-3820 and mail it to us, or bring the notification page to their local Social Security field office (FO). The notification page

serves as a back-up alert to the FOs that an applicant transmitted an internet disability report. Applicants also print, sign, and date approximately one SSA-827s, Authorization for Source to Release Information to the SSA.

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

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

3. **Use of Information Technology to Collect the Information**
In accordance with the agency's Government Paperwork Elimination Act plan, SSA created an Internet version of form SSA-3820. We estimate appropriately 99% of respondents under this OMB number use the electronic version and 1% uses the paper version.
4. **Why We Cannot Use Duplicate Information**
The nature of the information we are collecting and the manner in which we are collecting it preclude duplication. SSA does not use another collection instrument to obtain similar data.
5. **Minimizing Burden on Small Respondents**
This collection does not affect small businesses or other small entities.
6. **Consequence of Not Collecting Information or Collecting it Less Frequently**
If we did not use form SSA-3820-BK, we would not be able to determine whether the claimant qualifies for disability. Because we only collect the information once, we cannot collect it less frequently.
7. **Special Circumstances**
There are no special circumstances that would cause SSA to conduct this information collection in a manner inconsistent with 5 CFR 1320.5.
8. The 60-day advance Federal Register Notice published on May 13, 2010, at 75 FR 27036, and we received no public comments. SSA published the second Notice on September 03, 2010 at 75 FR 54211. If we receive comments in response to the 30-day Notice, we will forward them to OMB. We did not consult with the public in the revision of this form.
9. SSA does not provide payments or gifts to the respondents.
10. SSA protects and holds confidential the information it collects 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, our Privacy Policy protects information collected by SSA for Internet

Services that ensures the confidentiality of all information provided by the requester. Our Internet privacy policy is:

- Employ internal access controls to ensure that the only people who see your information are those with a need to do so to perform their official duties.
- Train appropriate personnel on our privacy and security policies to know requirements for compliance.
- Secure the areas where we retain paper copies of the information we collect online.
- Perform regular backups of the information we collect online to ensure against loss.
- Use technical controls to secure the information we collect online including, but not limited to:
 - o Secure Socket Layer (SSL)
 - o Encryption
 - o Firewalls
 - o Password protections
- Periodically test our security procedures to ensure personnel and technical compliance.
- Employ external access safeguards to identify and prevent unauthorized tries of outsiders to “hack” into, or cause harm to, the information contained in our systems.

When we use contractors to perform various website and database functions. We make sure that the agreement language with the contractor ensures the security, confidentiality, and integrity of any personal information the contractor may have access to in the course of contract performance.

11. The information collection does not contain any questions of a sensitive nature.
12. 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)	93,293	1	2	186,586

Totals	515,793			426,219
--------	---------	--	--	---------

13. This collection does not impose a known cost burden to the respondents.
14. The annual cost to the Federal government is approximately \$10,761,616. This estimate is a projection of the costs for printing and distributing the collection instrument and for collecting the information.

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 to calculate the cost associated with just one Internet application.

15. There has been an increase in burden hours due to the increase amount of respondents completing Form SSA-3820-Bk on the Internet.
16. SSA will not publish the results of the information collection.
17. For the paper form SSA-3820-BK, we will not publish the OMB approval expiration date. OMB granted SSA an exemption from the requirement to print the OMB expiration date on its program forms. SSA produces millions of public-use forms with life cycles exceeding those of an OMB approval. Since SSA does not periodically revise and reprint its public-use forms (e.g., on an annual basis), OMB granted this exemption so SSA would not have to destroy stocks of otherwise useable forms with expired OMB approval dates, avoiding Government waste.

For the Internet version of form SSA-3820-BK, SSA is not requesting an exception to the requirement to display the OMB approval expiration date.

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. Collection of Information Employing Statistical Methods

SSA does not use statistical methods for this information collection.