

**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. **Introduction/Authoring Laws and Regulation**

Section 202(d) of the *Social Security Act* provides, under certain conditions, for payment of monthly benefits to students who are children of entitled workers. The Social Security Administration (SSA) collects the following on Forms SSA-1372-BK and SSA-1372-BK-FC: (1) information from the student regarding his or her attendance at an educational institution and (2) verification of the student's allegations about school attendance from a school official. 20 CFR 404.350, 404.351, 404.352, 404.367 and 404.368 of the *Code of Federal Regulations* describe the information necessary to determine student eligibility.

2. **Description of Collection**

SSA collects the information on Forms SSA-1372-BK and SSA-1372-BK-FC to determine if the children of an insured worker are eligible for student benefits. The collected data allow SSA to determine whether student entitlement exists and when it will end. SSA uses the SSA-1372-BK for domestic student claimants and the SSA-1372-BK-FC for student claimants living and attending school outside the United States. Since 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 that do not apply to schools in foreign countries. The two versions of the form ask the same essential information. SSA collects this information usually once per student, but a student who changes schools or who does not graduate on schedule must complete another form and a school official must certify it. Child beneficiaries in SSA's system 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 return the completed form to SSA for review and processing. The respondents are applicants for student benefits. School officials are also respondents, and they must complete their portion of the form for a student to obtain benefits.

3. **Use of Information Technology to Collect the Information**

SSA did not create an electronic version of the SSA-1372 under the agency's Government Paperwork Elimination Act (GPEA) because the form requires wet signatures from both the student and the school official, and we cannot use the form electronically from start to finish. The form is available on the SSA website as a print-only PDF, but the respondent must still mail or return it in person to SSA. SSA has no way to authenticate email addresses, and, therefore, cannot consider an emailed version of the form a wet signature. SSA will reevaluate the possibility of making an electronic version when new technology is available that would allow both the students and the schools to fill out the form without the possibility of fraud.

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

Collection of this information takes place when a child, who can only be entitled as a student, files a claim, or when a child, currently entitled to benefits, reaches age 18. If SSA did not collect this information, the agency would be unable to determine entitlement to student benefits. Since we only collect this information when the above-mentioned situations apply, we cannot collect it less frequently. There are no technical or legal obstacles to burden reduction.

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. Solicitation of Public Comment and Other Consultations with the Public

The 60-day advance Federal Register Notice published on November 12, 2010 at 75 FR 69516, and SSA received no public comments. The second Notice published on January 28, 2011 at 76 FR 5233. If we receive any comments in response to the 30-day Notice, we will forward them to OMB. SSA did not consult members of the public in the development or maintenance of this form.

9. Payment or Gifts to Respondents

SSA does not provide payments or gifts to the respondents.

10. Assurances of Confidentiality

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.

11. Justification for Sensitive Questions

The information collection does not contain any questions of a sensitive nature.

12. Estimates of Public Reporting Burden

Approximately 200,000 respondents, both within and 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 18,334 burden hours. The charts below show the breakdown of the respondents (domestic and foreign, student and school official):

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	8	13,313
State/Local/ Tribal Government	99,850	1	3	4,993
Totals	199,700			18,306

SSA-1372-BK-FC :

Type of Respondent	Number of Respondents	Frequency of Response	Average Burden Per Response (minutes)	Total Annual Burden (hours)
Individuals/ Households	150	1	8	20
State/Local/ Tribal Government	150	1	3	8
Totals	300			28

Grand Total	18,334			18,334
--------------------	---------------	--	--	---------------

The total burden for this ICR is **18,334 hours**. This figure represents burden hours, and we did not calculate a separate cost burden.

13. Annual Cost to the Respondents (Other)

This collection does not impose a known cost burden on the respondents.

14. Annual Cost To Federal Government

The annual cost to the Federal Government for this collection 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. Program Changes or Adjustments to the Information Collection Request

There are no changes to the public reporting burden.

16. Plans for Publication Information Collection Results

SSA will not publish the results of the information collection.

17. Displaying 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.

18. Exceptions to Certification Statement

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**

SSA does not use statistical methods for this information collection.