OMB SUPPORTING STATEMENT

RI 25-14 – Self-Certification of Full-Time School Attendance

A. Justification

- 1. Title 5, U. S. Code, Chapter 83, Section 8341 and Chapter 84, Section 8441 provide for survivor benefits for children of deceased Federal employees, including adult students age 18 to 22 who are unmarried and are full-time students in recognized schools. No more than a five-month break between school terms is permitted without loss of benefits for the period the child was not in school.
- 2. RI 25-14 is an optical-mark-recognition (optical scan) form the Office of Personnel Management (OPM) mails each school year to the payees receiving student survivor benefits. When the responses are received, OPM "reads" the forms to determine whether to continue the student benefit. The form has been revised to give the school authority to respond to questions from OPM about the student's attendance and to provide space for the email address of the persons who sign the form. If this information were not collected, we might continue to pay benefits to persons who are no longer entitled. The Public Burden Statement meets the requirements of 5 CFR 1320.8(b)(3).
- 3. The information collected is detailed and can only be obtained from the respondents. New methods of information technology would do little to reduce the burden on the respondents. However, this form is available on our website in a pdf fillable format and meets our GPEA requirement.
- 4. The information is collected individually. Duplication is minimized. Up-to-date, similar information certified by the respondent is not available from other sources.
- 5. Information is not collected from small businesses.
- 6. Less frequent collection would cause OPM to pay persons who may no longer be eligible and could deny or delay payments to entitled student survivor annuitants.
- 7. This information collection is consistent with the guidelines in 5 CFR 1320.6, except 1320.6(b). A response is required within 30 days in order to prevent payments to survivor annuitants who are no longer eligible.
- 8. A notice of proposed information collection was published in the *Federal Register* on July 15, 2010, as required by 5 CFR 1320, giving persons outside the agency an opportunity to comment on the form. No comments were received.
- 9. No payment or gift is provided to respondents.
- 10. This information collection is protected by the Privacy Act of 1974 and OPM regulations (5 CFR 831.106). The routine uses for disclosure appear in the *Federal Register* for OPM/Central-1 (73 FR 15013, *et seq.*, March 20, 2008).

- 11. This information collection does not include questions of a sensitive nature, such as sexual behavior and attitudes, religious beliefs, and other matters that are commonly considered private.
- 12. Approximately 14,000 forms are processed annually. The forms require about 12 minutes to complete for an annual burden of 2,800 hours. This burden is not expected to vary.
- 13. There is no cost to the respondents.
- 14. The annualized cost to the Federal government is \$35,300. This cost was determined by employee salary hours devoted to the program, forms cost, and overhead.
- 15. There are no changes to the respondent burden.
- 16. The results of this information collection are not published.
- 17. It is not cost effective to reprint the whole supply of forms to change the OMB clearance expiration date. Therefore, we seek approval not to display the date on the form.
- 18. There are no exceptions to the certification statement.