Justification for Non-Substantive Changes for SSA-3368, i3368 Disability Report - Adult 20 CFR 404.912, 20 CFR 404.1512 OMB No. 0960-0579

Terms of Clearance

As a condition of OMB's approval of this ICR, SSA agrees to destroy its entire stock of the prior SSA-3368 form. In addition, SSA agrees that it will make no further revisions to the SSA-3368 (OMB 0960-0579) within the three year period for which it's approved. In agreeing to this condition, SSA will be allowed to use the paper form for the three-year period without printing an expiration date.

As per the terms of clearance OMB imposed on 11/6/09, SSA destroyed its centrally stored stock of the paper SSA-3368. The current version instructs users to destroy previous editions of the form. SSA also agreed to make no further revisions to the SSA-3368 within the three-year approval period. This change request does not propose any change to the content of the questions in the paper version, or the electronic EDCS and Internet versions. The only change is in what questions we present to the users who qualify for expedited processing, something already allowed for three of the four categories shown below.

Justification for Non-Substantive Changes to the Collection

This change request applies to the Internet and EDCS versions of the SSA-3368 Disability Report – Adult. We plan to implement the changes on 7/30/11.

The purpose of this proposed change is to accommodate a change in policy. The policy change reduces the burden on disability claimants who allege having medical conditions that qualify for expedited processing under SSA's Compassionate Allowance (CAL) initiative.

Social Security has an obligation to provide benefits quickly to applicants whose medical conditions are so serious that their conditions obviously meet disability standards. The CAL initiative is a way of quickly identifying diseases and other medical conditions that invariably qualify under the Listing of Impairments based on minimal objective medical information. Compassionate allowances allow Social Security to target the most obviously disabled individuals for allowances based on objective medical information that we can obtain quickly.

Current SSA rules allow the curtailment of the job history and education history sections of the SSA-3368 for cases with certain characteristics; i.e., we do not collect job and education histories for those cases. We curtail collection of that information because, statistically, SSA allows the large majority of those cases without needing to consider job and education histories. Case characteristics for which SSA may curtail collecting job and education information include:

- 1. Claimants with terminal illness;
- 2. Claimants with medical conditions for which SSA may make presumptive disability payments;
- 3. Military casualty cases, where the medical condition is severe; and,
- 4. Claimants alleging recognized CAL conditions from the Listing of Impairments.

We request these changes to the Internet versions of the SSA-3368 before regular OMB renewal of the SSA-3368 because:

- The policy on curtailing completion of the SSA-3368 for those alleging recognized CAL conditions went into effect in March 2011.
- The changes will conform all versions of the SSA-3368 to the curtailment policy described above; and,
- They reduce the burden on Internet i3368 users when the alleged disabling medical conditions qualify them for expedited processing under the CAL initiative.

SSA does not anticipate any changes to the burden due to the addition of this CAL initiative, as we already process CAL applications through the paper and EDCS versions of the SSA-3368. These revisions will give the public another modality to use for requesting CAL applications.

Changes Requested for the SSA-3368

Paper Version SSA-3368:

The paper version does not require change.

EDCS Screens for the SSA-3368:

The EDCS version of the SSA-3368 already allows curtailment for cases with characteristics 1 through 3, above. Implementing curtailment for CAL conditions (characteristic 4) in the EDCS version does not require any change in the current questions or screen path. EDCS will handle curtailment for CAL no differently than it does for the other types of cases.

The only screen change for the EDCS version is the removal of the "*Calculate CAL*" button on the *Physical and Mental Condition Information* screen. The "*Calculate CAL*" button is a tool for the use of EDCS users. The "*Calculate CAL*" function will become automatic with the 7/30/11 release; there will be no need for the "*Calculate CAL*" button, so we will remove it from the screen.

Internet Version i3368:

The i3368 will continue to use the previously approved screens for cases that do not qualify for curtailment. The changes requested for the i3368 apply to curtailed cases. The changes do not alter the questions in the current form, nor do they change the location of any question on the screens. If the i3368 software recognizes an alleged medical condition that qualifies for CAL expedited processing, it will remove the job and education history questions from the screen path.

The attached screenshots (Figures 1 through 5) illustrate the required changes to the i3368. Some of the screenshots have explanatory test boxes superimposed on the image. The text boxes do not hide any of the screen text from view. Figures 4 and 5 are composed of multiple screenshots of different portions of individual screens. Those two screens require Internet users to scroll down the screens to read all the information displayed. For that reason, they are too long to display in a single screenshot.

Brief description of the figures:

- Figure 1 is a screenshot of the *Work/Education Introduction* screen the i3368 will display for curtailed cases.
- Figure 2 displays two different presentations of the *Work Activity* screen for curtailed i3368 screens. The displayed questions will vary according to the answer given on the *Work/Education Introduction* screen.
- Figure 3 is the *Job History* screen for the curtailed i3368. The i3368 displays the question on that screen only when needed. The answers on the *Work Activity* screen determine the need for the question on this screen.
- Figure 4 displays the *Review* screen for curtailed i3368.
- Figure 5 displays the *Receipt for Your Records* screen.