

OMB SUPPORTING STATEMENT

RI 25-41 – Initial Certification of Full-Time School Attendance

A. Justification

1. Title 5, U. S. Code, Chapter 83, Section 8341(a)(4) and Chapter 84, Section 8441(4)(C) require the Office of Personnel Management (OPM) to pay survivor benefits to children of deceased Federal employees and annuitants if the children are 1) between the ages of 18 and 22, 2) unmarried, and 3) full-time students in a recognized school.
2. The information collected is used by OPM to determine if the child is eligible to receive survivor benefits. If this information collection were not made, OPM would be unable to determine whether unmarried dependent children (between 18 and 22 years of age) are eligible to receive survivor benefits. The form has been revised to update the public burden statement. 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; they must sign certifying the truth of their statements, under penalty of law. A Portable Document Format fill-able file is posted on the OPM website and meets our GPEA requirements.
4. Certifications are filed individually because this information is not available elsewhere. Duplication is minimized.
5. Information is not collected from small businesses.
6. Since this form is used only once to determine initial entitlement to benefits, frequency of use is not an issue. Less frequent collection would deny the payment of annuities provided by law.
7. The collection is consistent with the guidelines in 5 CFR 1320.6. The respondents are not required to answer within any particular time limit. However, OPM will not pay a student until a response is made.
8. A notice of proposed information collection was published in the *Federal Register* on June 4, 2012, 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. We estimate 1,200 certifications will be processed annually. The forms require about 90 minutes to complete. Burden of 1,800 hours is estimated and is not expected to vary substantially.
13. There is no cost to the respondent.
14. The annualized cost to the Federal government is \$13,750. 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.