

**Supporting Statement for Function Reports - Child
Forms SSA-3375, 3376, 3377, 3378, and 3379
20 CFR 416.912 and 416.924a(a)(2)**

OMB No. 0960-0542

A. Justification

1. Introduction/Authoring Laws and Regulations

Section 1614(a)(3)(A) of the *Social Security Act (Act)*, mandates the Social Security Administration (SSA) consider children disabled under title XVI of the *Act* if they have “a medically determinable physical or mental impairment, which results in marked and severe functional limitations....” Sections 1614 (a)(3)(H)(i), 223(d)(5) (A), and 1631(e)(1)(A) of the *Act* and 20 CFR 416.912 of the *Code of Federal Regulations* grant SSA the authority to establish requirements for the collection of information to help determine a child’s eligibility under title XVI.

To assess a child claimant’s functional limitations, we collect information from individuals in a position to know the child’s daily functioning, including the child’s parent(s) or other primary caregiver(s) (hereinafter referred to just as “parent”). This is discussed in 20 CFR 416.924a(a)(2).

2. Description of Collection

Forms SSA-3375-BK through SSA-3379-BK request information from the child’s parent about the child’s day-to-day functioning. The five different versions of the form contain questions about functioning appropriate to a particular age group; thus, we only use one version of the form for each child. While we do not require respondents to complete the form, it is beneficial for them to do so.

The adjudicative team (disability examiners and medical/psychological consultants) of State disability determination services (DDS) collect the information on the appropriate version of this form (in conjunction with medical and other evidence) to form a complete picture of children’s ability to function and of their impairment-related limitations. We only collect this information once per child applying for disability. When this profile of the child’s functioning is complete, the adjudicative team determines whether or not the child’s impairment(s) results in marked and severe functional limitations, and, therefore, whether or not the child is disabled.

When we complete the forms in an interview setting in an SSA field office, the interviewer helps the parents complete the form. In some instances, however, parents fill out the forms at home. The respondents are parents or guardians of child applicants for Supplemental Security Income (SSI).

3. Use of Information Technology To Collect the Information

In accordance with the agency's Government Paperwork Elimination Act plan, SSA created an electronic version of these forms. When we complete these forms in an interview setting in a field office or via telephone, SSA personnel enter the information through the Electronic Disability Control System (EDCS). In some instances, however, parents fill out the forms at home on paper. Based on our data, we estimate approximately 90 percent of respondents use EDCS.

4. Why We Cannot Use Duplicate Information

We coordinated the development and revision of other forms used in childhood disability cases, e.g., SSA-3820 and SSA-3881, to avoid duplication. SSA does not have any similar information about a child's daily functioning that we could use in place of information from the child's parent. There are other sources of information about a child's functioning including schoolteachers, and we collect information from all other such sources as well. However, the regulations require us to form a complete picture of a child's ability to function, and this would be impossible without consideration of the child's functioning in the home setting.

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

The DDSs collect the information once as part of the initial claims process. We may collect updated information if we conduct a continuing disability review (CDR) regarding a child who is already receiving SSI payments. If the DDSs did not collect this information on our behalf, it would significantly compromise SSA's ability to make accurate and supportable disability determinations in childhood disability cases. 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

SSA published the 60-day advance Federal Register Notice on March 20, 2013 at 78 FR 17276, and we received one public comment. We have addressed that comment in the addendum to the supporting statement. We published the 30-day Notice on May 30, 2013 at 78 FR 32527. If we receive any comments in response to the 30-day Notice, we will forward them to OMB. SSA did not consult with members of the public in the development or maintenance of these forms.

9. Payment or Gifts to Respondents

We do 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

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

12. Estimates of Public Reporting Burden

When initially applying for SSI on behalf of a child, we ask each respondent (individuals/households only) to provide one response to the Function Report form appropriate to the child's age. We may need an additional response if we conduct a CDR of the child's case. Based on case counts in the 2011 SSI Report to Congress, approximately 660,000 respondents complete Forms SSA-3375, 3376, 3377, 3378 and 3379 annually in initial and CDR cases. It takes approximately 20 minutes to fill out the appropriate form for a particular child's age, for a total annual burden of 220,000 hours. This figure represents burden hours, and we did not calculate a separate cost burden.

13. Annual Cost to the Respondents

There is no known cost burden to the respondents.

14. Annual Cost to Federal Government

The estimated annual cost to the Federal Government is approximately \$10,956,000. This estimate is a projection of the costs for printing and distributing the paper forms and for collecting the information on all five Function Report forms, plus the annual burden hours of completion of the EDCS screens at the field offices.

15. Program Changes or Adjustments to the Information Collection Budget

We based the change in the number of respondents and the associated hour burden (from 550,000 respondents in the previous clearance request to 660,000 in this request) on the case data in the 2011 SSI Report to Congress. An increase in the number of respondents completing the forms was the cause of this change in the public reporting burden. SSA did not initiate any program changes that would cause an increase in respondents.

16. Plans for Publication Information Collection Results

SSA will not publish the results of this 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 exceeding those of an OMB approval. SSA does not periodically revise and reprint its public-use forms (for example, 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. Exemptions 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 will not use statistical methods for this information collection.