

**SUPPORTING STATEMENT FOR
QUESTIONNAIRE FOR CHILDREN CLAIMING SSI BENEFITS**
Form SSA-3881
20 CFR 416.912(a)
OMB No. 0960-0499

A. Justification

1. Introduction/Authoring Laws and Regulations

Section 1631(d)(2) of the *Social Security Act* (*Act*) gives the agency the authority to collect the information we need to determine the validity of an applicant's claim for SSI payments. *Public Law 104-193*, the *Personal Responsibility and Work Opportunity Reconciliation Act of 1996*, gives the definitions and eligibility rules for disabled children. Section 20 CFR 416.912(a) of the *Code of Federal Regulations* states that an applicant must furnish medical and other evidence that SSA can use to reach conclusions about a child's medical condition.

2. Description of Collection

Parents or legal guardians seeking to obtain or retain Supplemental Security Income (SSI) eligibility for their children use Form SSA-3881-BK to provide SSA with the addresses of non-medical sources such as schools, counselors, agencies, organizations, or therapists who have information about a child's function. SSA uses this information to help determine a child's claim or continuing eligibility for SSI. The respondents are applicants who appeal SSI childhood disability decisions or recipients undergoing a continuing disability review.

3. Use of Information Technology to Collect the Information

Form SSA-381 is available electronically to the public on SSA's website in a portable document format (PDF). SSA did not create an electronic version of Form SSA-381 due to other forms taking precedence.

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 any other collection instrument to collect 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

If we did not use Form SSA-3881, we would have no means of ensuring that 1) our initial denials of child applicants for SSI were correct or 2) that our determinations for continuing eligibility for child SSI payments are accurate. Because we only collect the information on an as needed basis, 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 March 21, 2014, at 74 FR 15782, and we received no public comments. The 30-day FRN published on May 29, 2014 at 79 FR 30922. If we receive any comments in response to this Notice, we will forward them to OMB.

9. Payment or Gifts to Respondents

SSA does not provide payment or gifts to the respondents.

10. Assurances of Confidentiality

SSA protects and holds confidential the information 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

Modality of Completion	Number of Respondents	Frequency of Response	Average Burden per Response (minutes)	Estimated Total Annual Burden (hours)
Appeals Cases	65,000	1	30	32,500
Disability Review Cases	45,000	1	30	22,500
Total	110,00			55,000

The total burden for this ICR is 55,000 hours, and we did not calculate a separate cost burden.

13. Annual Cost to the Respondents (Other)

There is no cost burden to the respondents.

14. Annual Cost To Federal Government

The annual cost to the Federal Government for form SSA-3881 is approximately \$1,558,480. 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 has been a decrease in burden hours. This decrease stems from SSA conducting fewer disability reviews due to budgetary constraints.

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 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.