Supporting Statement for Form SSA-3371-BK
Pain Report-Child
20 CFR 416.912, 404.512
OMB No. 0960-0540

A. Justification

1. **Introduction/Authoring Laws and Regulations**

Sections *1614 (a)(3)(H)(i)* and *1631(e)(1)* of the *Social Security Act* (*Act)* require claimants for SSA benefits to furnish medical and other evidence of disability as required to prove their disability. Disability regulations in *20 CFR 416.912* and *404.512* state individuals must provide medical evidence and, if asked, evidence of age, education, training, work experience, daily activities, efforts to work, and any other evidence showing how their impairment(s) affects the ability to work or, in the case of a child, how the claimants function. Section *1631(d)(1)* of the *Act* provides the Commissioner of the Social Security Administration (SSA) with the full power and authority to make rules and regulations, establish procedures, and to adopt reasonable and proper rules for the nature and extent of the evidence as well as the methods of taking and furnishing the same to evaluate the alleged disability. The Social Security Administration (SSA) uses Form SSA-3371-BK to record information about pain or other systems of a child who is claiming disability.

2. **Description of Collection**

Before SSA can make a disability determination for a child, we require evidence from Supplemental Security Income (SSI) applicants or claimants to prove their disability. Form SSA-3371-BK provides disability interviewers, and SSI applicants or claimants in self-help situations, with a convenient way to record information regarding claimant's pain or symptoms. The state disability determination services adjudicators and administrative law judges use the information from Form SSA-3371-BK to access the effects of symptoms on claimants' ability to function, for purposes of determining disability under the *Act*. The respondents are applicants for, or claimants of, SSI payments.

3. **Use of Information Technology to Collect the Information**

SSA did not create an electronic version of Form SSA-3371-BK under the agency's Government Paperwork Elimination Act due to higher volume forms taking precedence.

4. **Why We Cannot Use Duplicate Information**

The nature of the information we collect and the manner in which we collect it preclude duplication. SSA does not use another collection instrument to obtain 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**
The information and medical evidence this form collects are the basis of the initial disability evaluation process. If we did not collect this information, we could not discharge our mandate to pay SSI to disabled claimants, as it would be impossible to determine if claimants were truly disabled. Since SSA collects this information every time a claimant files for SSI, 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 September 16, 2015, at 80 FR 55705, and we received no public comments. The 30-day FRN published on November 19, 2015 at 80 FR 72468. If we receive any comments in response to this Notice, we will forward them to OMB. We did not consult with the public in the revision of this form.

9. **Payment or Gifts to Respondents**
SSA does 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**
The information collection does not contain any questions of a sensitive nature.

12. **Estimates of Public Reporting Burden**

Modality of Collection	Number of Respondents	Frequency of Response	Average Burden Per Response (minutes)	Estimated Total Annual Burden (hours)
SSA-3371	250,000	1	15	62,500

The total burden for this ICR is 62,500. This figure represents burden hours, and we did not calculate a separate cost burden.

13. **Annual Cost to the Respondents (Other)**
This collection does not impose a known cost burden to the respondents.

14. **Annual Cost to Federal Government**
The annual cost to the Federal Government is approximately $1,540,000. 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 are no changes to the public reporting burden.

16. **Plans for Publication Information Collection Results**
SSA will not publish the results of the 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.