

**Supporting Statement for Form SSA-3820-BK**  
**Disability Report-Child**  
**20 CFR 416.912**  
**OMB No. 0960-0577**

**A. Justification**

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

Sections 205(a) and 1631(d)(1) of the *Social Security Act (Act)*, provide the Commissioner of the Social Security Administration (SSA) 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 needed, as well as the methods of taking and furnishing the same, to evaluate an alleged disability. Sections 223(d)(5)(A) and 1631(e)(1) of the *Act* require that claimants for SSA benefits furnish such medical and other evidence of disability as the Commissioner may require to prove they are disabled.

20 CFR 416.912 of the *Code of Federal Regulations*, specifically states, among other things, that individuals will furnish medical evidence and, if asked, evidence of age; education and training; work experience; efforts to work; and any other evidence showing how their impairment(s) affects the ability to work, or in the case of a child, the ability to function. SSA uses Form SSA-3820-BK, Disability Report-Child, to help collect this information.

**2. Description of Collection**

SSA uses Form SSA-3820-BK to collect information about a child's impairment from treatment sources or other medical sources of evidence. State Disability Determination Services evaluators use the information from the SSA-3820-BK to develop medical and school evidence, and to assess the alleged disability. The information, together with medical evidence, establishes the evidentiary basis upon which SSA makes its initial disability evaluation. Claimants can complete and print Form SSA-3820-BK and mail to SSA, or take the notification page to their local Social Security field office (FO). The notification page serves as a back-up alert to the FOs that an applicant transmitted an internet disability report. When claimants do not complete an i3820, FO employees use the Electronic Disability Collect System (EDCS) internal collection process to key information provided by claimants onto EDCS screens to establish a database for the DDS adjudicators. The respondents are claimants seeking SSI childhood disability payments.

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

In accordance with the agency's Government Paperwork Elimination Act plan, SSA created an Internet version of form SSA-3820-BK. Based on our data, we estimate approximately 30% of respondents under this OMB number use the electronic version. In addition, we also collect information electronically through our EDCS version of the form during in-person or telephone interviews.

- 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**

If we did not use Form SSA-3820-BK, we would not be able to determine whether claimants qualify for disability. Because we only collect the information once, 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**

SSA published the 60-day advance Federal Register Notice on July 18, 2016 at 81 FR 46752, and we received no public comments. We published the 30-day Notice on October 3, 2016 at 81 FR 68091. If we receive any public comments, we will forward them to OMB. There have been no outside consultations with members of the public.
- 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**

When initially applying for SSI on behalf of a child, we ask each respondent (individuals/households only) to provide one response to the form. Based on the 2015 Annual Report of the Supplemental Security Income Program, approximately 399,466 respondents take 120 minutes to complete i3820 form, and 90 minutes to complete the paper form, each year. The following chart shows the burden for each modality of the form:

<b>Modality of Completion</b>	<b>Number of Respondents</b>	<b>Frequency of Response</b>	<b>Average Burden Per Response (minutes)</b>	<b>Estimated Total Annual Burden (hours)</b>
SSA-3820	279,002	1	90	418,503
EDCS	1,000	1	120	2,000
i3820	119,464	1	120	238,928
<b>Totals</b>	<b>399,466</b>			<b>659,431</b>

The total burden for this ICR is 659,431 hours. This figure represents burden hours, and we did not calculate a separate cost burden.

**13. Annual Cost to the Respondents**

This collection does not impose a known cost burden on the respondents.

**14. Annual Cost to Federal Government**

The estimated annual cost to the Federal government is approximately \$54,108. This estimate is a projection of the costs for printing and distributing the paper form and for collecting the information.

**15. Program Changes or Adjustments to the Information Collection Request**

The increase in burden hours stems from an increase in the public completing the paper version of Form SSA-3820.

**16. Plan for Publication Information Collection Results**

SSA will not publish the results of the information collection.

**17. Displaying the OMB Approval Expiration Date**

For the paper Form SSA-3820-BK, we will not publish 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 (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.

For the Internet version (i3820) of form SSA-3820-BK, SSA is not requesting an exception to the requirement to display the OMB approval expiration date.

**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. Collection of Information Employing Statistical Methods**

SSA will not use statistical methods for this information collection.