

Supporting Statement for Form SSA-1372-BK and SSA-1372-BK-FC
Advance Notice of Termination of Child's Benefits and
Student's Statement Regarding School Attendance
20 CFR 404.350-404.352, 404.367-404.368
OMB No. 0960-0105

A. **Justification**

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

Section 202(d) of the *Social Security Act (Act)* provides, under certain conditions, for payment of monthly benefits to students who are children of entitled workers. The Social Security Administration (SSA) collects the following on Forms SSA-1372-BK and SSA-1372-BK-FC: (1) information from students regarding their attendance at an educational institution, and (2) verification of students' allegations about school attendance from a school official. 20 CFR 404.350, 404.351, 404.352, 404.367, and 404.368 of the *Code of Federal Regulations* describe the information necessary to determine student eligibility.

2. **Description of Collection**

SSA collects information on Forms SSA-1372-BK and SSA-1372-BK-FC to determine if the children of an insured worker meet the eligibility requirements for student benefits. The data we collect allows SSA to determine student entitlement, and assess whether to terminate benefits. SSA uses the SSA-1372-BK for domestic student claimants and the SSA-1372-BK-FC for student claimants living and attending school outside the United States. The respondents are student claimants for Social Security benefits; their respective schools; and in some cases, their representative payees.

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

Form SSA-1372-BK and SSA-1372-BK-FC are available on SSA's website as a print only digital file. SSA did not create an electronic version of Form SSA-1372-BK or SSA-1372-BK-FC under the agency's Government Paperwork Elimination Act due to a lack of resources.

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 Forms SSA-1372-BK and SSA-1372-BK-FC, we would not be able to determine a student's entitlement to benefits. Since we collect this

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 February 14, 2017, at 82 FR 10623, and we received no public comments. The 30-day FRN published on April 18, 2017 at 82 FR 18335. 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 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

SSA-1372-BK:

Type of Respondent	Number of Respondents	Frequency of Response	Average Burden Per Response (minutes)	Estimated Total Annual Burden (hours)
Individuals/Households	99,850	1	8	13,313
State/Local/Tribal Government	99,850	1	3	4,993
Totals	199,700			18,306

SSA-1372-BK-FC:

Type of Respondent	Number of Respondents	Frequency of Response	Average Burden Per Response (minutes)	Estimated Total Annual Burden (hours)
Individuals/Households	1,198	1	8	160
State/Local/Tribal Government	1,198	1	3	60
Totals	2,396			220

Grand Total	200,096			18,526
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The total burden for this information collection request is 18,526 hours. 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 on the respondents.

14. Annual Cost To Federal Government

The annual cost to the Federal Government for this collection is approximately \$1,232,000. 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

The increase in burden hours for Form SSA-1372-BK-FC is due to increasing immigrant population in several regions.

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.