

**Supporting Statement for the SSA-3368  
Disability Report-Adult  
20 CFR 404.1512 and 416.912  
OMB No. 0960-0579**

**A. Justification**

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

Adult applicants for Social Security Administration (SSA) disability benefits must provide medical, job history, and any other evidence required by SSA's Commissioner to prove that their impairments are disabling. Since SSA needs a vehicle to collect this evidence, we use the paper Form SSA-3368 and its electronic versions, Electronic Disability Collect System (EDCS) 3368 and the Internet i3368, for this purpose. Sections 223(d)(5)(A) and 1631(e)(1) of the *Social Security Act (Act)* provide that individuals must furnish medical and other evidence to prove they are disabled. The regulations at Sections 20 CFR 404.1512 and 416.912 of the *Code of Federal Regulations* state individuals must inform us about, or submit all evidence known or which relates to whether or not they are blind or disabled, and if asked, inform us about medical sources; age; education and training; work experience; daily activities efforts to work; and any other factors showing how impairment(s) affects his or her ability to work. Sections 205(a) and 1631(d)(1) of the *Act* give the Commissioner the authority to establish regulations and procedures governing the type of evidence needed to evaluate an alleged disability and methods of collecting this evidence.

**2. Description of Collection**

State Disability Determination Services (DDS) use Form SSA-3368, and its electronic versions, to determine if an adult disability applicant's impairment(s) is severe and, if so, how the impairment(s) affects the applicant's ability to work. This determination dictates whether or not the DDS and SSA will find the applicant disabled and entitled to Supplemental Security Income (SSI) payments. The respondents are applicants for Title II disability or SSI payments.

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

In accordance with the agency's Government Paperwork Elimination Act plan, SSA created electronic versions of Form SSA-3368. Based on our data, we estimate approximately 97 percent of respondents under this OMB number use the electronic versions. SSA designed the electronic modalities to collect the same information as the paper form, however it is formatted differently to include certain enhancements (e.g., instructions and help screens) to guide the interviewer or applicant through the application process.

• **Electronic Disability Collect System (EDCS) SSA-3368:**

Applicants may call or go into the SSA Field Office to provide the information the collection requires. In these cases, a claims representative interviews the applicant and enters their answers directly into the EDCS SSA-3368. Approximately 70 percent of respondents use this option.

- **Internet 3368 (i3368):**

The i3368 is a fully electronic version of the paper form. Adult disability applicants or their representatives may access, complete, and submit the SSA-3368 electronically through this internet-based application. SSA designed the i3368 to walk first-time users through this information collection. It contains numerous help screens and explanations about why we ask certain questions on the form. Approximately 30 percent of respondents use this option.

We also provide applicants with a fillable and printable PDF version of the form on SSA's website, for respondents to complete, print, and bring or mail to SSA.

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

The nature of the information we collect and the manner in which we collect it precludes duplication. SSA does not use another collection instrument to obtain similar data.

5. **Minimizing Burden on Small Respondents**

This collection does not significantly 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-3368, the public would have no way to apply for disability benefits. We would deprive individuals of the right to present evidence pertaining to their claim. Because we 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 April 24, 2018, at 83 FR 17872, and we received no public comments. The 30-day FRN published on July 26, 2018 at 83 FR 35526. 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**

The following chart shows the burden for each modality of the SSA-3386:

<b>Modality of Completion</b>	<b>Number of Respondents</b>	<b>Frequency of Response</b>	<b>Average Burden Per Response (minutes)</b>	<b>Estimated Annual Burden (hours)</b>
SSA-3368 (Paper form)	7,571	1	90	11,357
Electronic Disability Collection System (EDCS)	2,484,231	1	90	3,726,347
i3368 (Internet)	1,060,360	1	90	1,590,540
<b>Totals</b>	<b>3,552,162</b>			<b>5,328,244</b>

The total burden for this information collection request is **5,328,244 hours**. We based these figure on current management information data. 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 is approximately \$35,958,328. This estimate accounts for costs from the following areas: (1) designing, printing, and distributing the form; (2) SSA employee (e.g., field office, 800 number, DDS staff) information collection and processing time; and (3) systems development, updating, and maintenance costs.

**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**

For our paper Form SSA-3368, 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.

For our Internet i3368 and EDCS 3368 modalities, SSA is not requesting an exception to the requirement to display the OMB approval expiration date.

**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.