

## OMB SUPPORTING STATEMENT

### RI 25-37 – Evidence to Prove Dependency of a Child

#### A. Justification

1. Title 5 U. S. Code, Sections 8341(a)(3) and 8441(3) state that benefits are payable to dependent children. OPM must determine that the children are eligible. RI 25-37 is designed to inform the person applying on behalf of the child of the needed documentation to establish eligibility. RI 25-37 is mailed to the applicants along with a cover letter to explain why OPM is requesting the information.
2. Based on the evidence provided, OPM determines whether the child is eligible for survivor benefits. If the child is eligible, annuity payments are made. If this information were not collected, payments could not be authorized. There are editorial changes to this ICR, which includes the rearranging/repositioning of the instructions as applicable. This ICR does not require a Privacy Act Statement.
3. New methods of information technology would do little to reduce the burden on the respondents. They must provide a copy of a State court order or affidavits stating specific information about the child. This form is available in a PDF format on our website and meets our GPEA requirements.
4. Documentation is submitted individually. There is no duplication because the respondents initiate the collection.
5. This information collection request has no impact on small businesses and organizations.
6. The collection of this information is performed as needed to determine entitlement and to authorize payment on individual survivor annuity claims. Less frequent collection would deny payments to children of deceased Federal employees and annuitants. This collection is consistent with the guidelines of 5 CFR 1320.6.
7. There are no special circumstances involved in the collection of this information.
8. A 60-day Federal Register Notice of proposed information collection was published in the *Federal Register* on May 5, 2017, giving persons outside the agency an opportunity to comment on the form. No comments were received.
9. No gifts or payments of any kind have been provided to any individuals who are connected to this collection.
10. This information collection is protected by the Privacy Act of 1974 and OPM regulations (5 CFR 831.106). The routine uses of disclosure appear in the *Federal Register* for OPM/Central-1 (73 FR 15013, *et seq.*, March 20, 2008, effective April 21, 2008).

11. This information collection does not include questions of a sensitive nature, such as sexual behavior and attitudes, religious beliefs, and other matters that are commonly considered private.
12. Approximately 250 dependency determinations are made annually. It takes about one hour to assemble the needed documentation. The annual burden is 250 hours.

Form Name	Form Number	No. of Respondents	No. of Responses per Respondent	Average Burden per Response (in hours)	Total Annual Burden (in hours)	Average Hourly Wage Rate	Total Annual Respondent Cost
Evidence to Prove Dependency of a Child	RI 25-37	250	1	1 hour	250	\$0	\$0

There is no cost to the respondents.

13. There is no change in the respondent burden.
14. The annualized cost to the Federal government is \$5,350. This cost includes employee salary hours devoted to the program, forms cost, and overhead.
15. N/A
16. No information collected from the form will be published.
17. The Retirement Services program office is the lone processor of the data collected on these ICRs from approximately 2.8 million customers. The substance of each information collection does not substantively change at each OMB renewal cycle, but according to changes in law and regulation. These forms are printed and published (internet, intranet and on-board systems) through various agencies for distribution to and implementation by Government customers. Pursuant to title 5 CFR 1320.8(b)(1), it would not be appropriate to display the OMB clearance expiration date where the form will not be revised for the foreseeable future (e.g., because it is used to collect applicant, annuitant, or beneficiary information required by long-standing statutory provisions), where use of the paper form is prevalent, and where, accordingly, it will be expensive and burdensome to restock the paper forms inventory with a new version. Last year, under current practice, Retirement Services printed approximately 2 million documents subject to OMB clearance at a cost of approximately \$85,000. Our costs would rise substantially if additional revision cycles are added. Lastly, by adding the OMB clearance expiration date to the existing format, the end users of OPM's ICRs may erroneously assume that the expiration date affects the validity of the information collection when it is the OMB clearance expiration date and not reflective of the substance. This may lead to additional submissions by customers, possible litigation and increasing pressures on our Operations

workloads. Therefore, we seek approval to **not** display the OMB clearance expiration date on the forms and to communicate version changes to the public via the revision date.

18. There are no exceptions to the certification statement.