

OMB SUPPORTING STATEMENT

RI 25-15 – Survey of Student’s Eligibility to Receive Benefits

A. Justification

1. Title 5, U. S. Code, Chapter 83, Section 8341(a)(4) and Chapter 84, Section 8441(4) provide that the Office of Personnel Management (OPM) shall determine the continuing eligibility of unmarried, dependent student children between the ages of 18 and 22 to receive survivor annuity benefits. RI 25-15 is used in February and October of each year to collect information from students regarding marital status, current and future plans for full-time school attendance and to verify that the student has continued the school attendance previously certified to OPM on RI 25-14, Self-Certification of Full-Time School Attendance (3602-0032). Only individuals whose benefits should stop are requested to return the form.
2. RI 25-15 is designed to give students an opportunity to inform OPM if they are not or will not be entitled to continue to receive survivor benefits. If this information were not collected, we might continue to pay benefits to persons who are no longer entitled. The Privacy Act Statement has been revised due to a general systematic review by our Chief Privacy Officer. The Public Burden Statement meets the requirements of 5 CFR 1320.8(b)(3).
3. The information collected is specific and can only be obtained from the respondents. New methods of information technology would do little to reduce the burden on the respondents; they must sign certifying the truth of their statements, under penalty of law. The form is available in a PDF fillable format on our website and meets our Government Paperwork Elimination Act requirements.
4. Every effort is made to identify and avoid duplication. The information is collected individually. There is no other way to obtain this information.
5. This information collection request has no impact on small businesses and organizations.
6. If this information is not collected, OPM may pay persons who are no longer eligible. The collection of this information is performed biannually.
7. There are no special circumstances involved in the collection of this information.
8. On November 28, 2018, A 60 Day Federal Register Notice was published at 83 FR 61175. No comments were received.
9. No payment or gift is provided to the respondents based on return of this form.

10. This information collection is protected by the Privacy Act of 1974 and OPM regulations (5 CFR 831.106). The routine uses for disclosure appear in the *Federal Register* for OPM/Central-1 (73 FR 15013, *et seq.*, March 20, 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 2,500 forms will be processed annually. RI 25-15 requires approximately 20 minutes to complete the form. The annual burden is 835 hours. A response is needed only if the student's status has or will change.

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
Survey of Student's Eligibility to Receive Benefits	RI 25-15	2,500	1	.3333	835	\$10.75	\$58,512.44

13. There is no change in the respondent burden.
14. We estimate that the annualized cost to the Government is \$43,900. This cost is derived from employee salaries, staff hours required to process the forms and the cost of publishing, storing and shipping forms.
15. N/A
16. The results of this information collection are not 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.