

Justification for Non-Substantive Changes for (form Number)
Title
CFR Citations
OMB No. 0960-0527

Justification for Non-Substantive Changes to the Collection

Revisions to the Collection Instrument

- **Change #1:** We are adding a header on page 3 of the form.

Justification #1: We accidentally removed the header prior to our OMB submission approved on 6/18/19. However, we need the header with the parties' information on each page to avoid confusion. In addition, since the Rep ID is first mentioned on page 4, we need to add this header back in on page 3.

- **Change #2:** We are adding the following sentence on page 5, in Section 5 continued, Affiliation Information: "Do not complete this section if you do not qualify for direct payment."

Justification #2: We recently received a request to clarify this section on the form. The concern we received is that it can be confusing to representatives who are not eligible for direct payment who may unnecessarily provide personal information that they do not need to provide. We agree with this request, and we are making this change to clarify the section.

We will implement these changes upon OMB's approval. These changes will not affect the public reporting burden on this form.

Resubmission of the Collection within One Year of OMB Approval

We are making these two changes within a year of OMB's approval, as these revisions will be helpful for our technicians when they process the form. Adding the header back in will help to ensure we can pair up the right claimant and representative when the pages are separated. In addition, adding the clarification sentence to Section 5 will help our technicians to process the form correctly. Because we received the comment after we received OMB's approval in June 2019, we decided it would be in the agency's favor to request the approval before collection is up for the next renewal.