

Supporting Statement for Form SSA-454-BK
Continuing Disability Review Report
20 CFR 404.1589 & 416.989
OMB No. 0960-0072

A. Justification

1. Introduction/Authoring Laws and Regulations

Sections 205(a) and 1631(e)(1)(A) of the *Social Security Act (Act)* provide the Commissioner of the Social Security Administration (SSA) with full power and authority to make rules and regulations, establish procedures, and adopt reasonable and proper procedures governing the nature and extent of the evidence (as well as the methods of taking and furnishing the same) to determine whether an individual continues to be disabled. Sections 223(d)(5)(A) and 1614(a)(3)(H)(i) of the *Act*, as amended, provide that claimants furnish such medical and other evidence required by the Commissioner to prove they continue to be disabled. Sections 221(i), 1614(a)(3)(H)(ii)(I) and 1633 (c)(1) of the *Act* require us to periodically review the cases of individuals who receive benefits under Title II or Title XVI of the *Act*, based on disability, to determine if disability continues. As provided in 20 CFR 404.1589 and 20 CFR 416.989 of the *Code of Federal Regulations*, we may conduct a review to determine whether benefit entitlement or eligibility continues for individuals receiving disability benefits.

2. Description of Collection

SSA uses Form SSA-454-BK, Continuing Disability Review Report to complete a mandatory review for the continue disability review (CDR). SSA considers adults eligible for payment if they continue to be unable to do substantial gainful activity because of their impairments, and we consider Title XVI children eligible for payment if they have marked and severe functional limitations because of their impairments. SSA also uses Form SSA-454-BK to obtain information on sources of medical treatment; participation in vocational rehabilitation programs (if any); attempts to work (if any); and if individuals believe their conditions are improved. When a disabled individual requires a CDR, a claims representative (CR) mails Form SSA-454-BK; and the respondent completes the form and sends it back to SSA; or the CR interviews the respondent and enters the information into the Electronic Disability Collection System (EDCS). EDCS electronically stores the information of the paper version of Form SSA-454-BK. The respondents are Title II or Title XVI disability recipients or their representatives.

3. Use of Information Technology to Collect the Information

In accordance with the agency's Government Paperwork Elimination Act plan, SSA created an Intranet version of Form SSA-454-BK, the EDCS. Based on our data, we estimate approximately 50% of respondents under this OMB number use the electronic version through a personal interview with a CR.

4. Why We Cannot Use Duplicate Information

					(dollars)*		(minutes) ***	
SSA-454-BK (Paper version)	270,500	1	60	270,500	\$10.22*	\$2,764,510**	24***	\$245**
Electronic Disability Collect System (EDCS)	270,500	1	60	270,500	\$10.22*	\$2,764,510**	24***	\$245**
Totals	541,000			541,000		\$5,529,020**		\$490**

* We based this figure on average DI payments, as reported in SSA’s disability insurance payment data.

** This figure does not represent actual costs that SSA is imposing on recipients of Social Security payments to complete this application; rather, these are theoretical opportunity costs for the additional time respondents will spend to complete the application. **There is no actual charge to respondents to complete the application.**

*** We based this figure on the average FY 2020 wait times for field offices, based on SSA’s current management information data.

The total burden for this ICR is **541,000** burden hours (reflecting SSA management information data), which results in an associated theoretical (not actual) opportunity cost financial burden of **\$5,529,020**. SSA does not charge respondents to complete our applications.

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 \$14,465,629. 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

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.