

Supporting Statement for Forms SSA-1383 and SSA-1383-FC
Student Reporting Forms
20 CFR 404.352(b)(2), 404.367, 404.368, 404.415, 404.434, 422.135
OMB No. 0960-0088

A. Justification

1. Introduction/Authoring Laws and Regulations

The Social Security Administration (SSA) uses Forms SSA-1383 and SSA-1383-FC, Student Reporting Forms, when a student beneficiary reports a change in circumstances that could affect continued entitlement to, and receipt of, benefits per Section 20 *CFR* 422.135 of the *Code of Federal Regulations*. Sections 202(d), 203(f) and 202(x)(1) of the *Social Security Act* authorizes SSA to collect the information on the SSA-1383. These sections set forth how earnings; marriage; change in school attendance; and incarceration affect a child's continuing entitlement to benefits if the child is a student. If: (1) annual earnings exceed a prescribed amount; and (2) the student beneficiary either earned over the monthly limit or rendered substantial services in self-employment, SSA may reduce or suspend benefits per 20 *CFR* 404.415 and 404.434. Section 20 *CFR* 404.352(b)(4) states that marriage will terminate the student's benefits, except in rare instances. Sections 20 *CFR* 404.367 and 404.368 provide that a student beneficiary must be in full-time attendance at an educational institution to qualify for benefits.

2. Description of Collection

To qualify for Social Security Title II student benefits, student beneficiaries must be in full-time attendance status at an educational institution. In addition, SSA requires these beneficiaries to report events that may cause a reduction, termination, or suspension of their benefits. SSA collects such information on Forms SSA-1383 and SSA-1383-FC to determine if the changes or events the student beneficiaries report will affect their continuing entitlement to SSA benefits. SSA also uses the forms to calculate the correct benefit amounts for student beneficiaries. SSA employees administer the information collection (IC) during an in-office interview, telephone interview, or through receipt of a mailed form. Respondents may provide information personally or solicit information from others to complete the IC. The respondents are Social Security Title II student beneficiaries.

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 Forms SSA-1383 and SSA-1383-FC. During in-office interviews, SSA employees enter information into the Post-entitlement Online System (POS), or the Manual Adjustment Credit and Award Data Entry (MACADE) system. Based on our data, we estimate approximately 80% of respondents under this OMB number use the electronic version.

4. **Why We Cannot Use Duplicate Information**
The nature of the information we collect and the manner in which we collect it preclude duplication. SSA does not use another collection instrument to obtain similar data.
5. **Minimizing Burden on Small Respondents**
This collection does not affect small businesses or other small entities.
6. **Consequence of Not Collecting Information or Collecting it Less Frequently**
If we did not use Forms SSA-1383 and SSA-1383-FC, the public would have no means to report events, which may result in the suspension or termination of benefits per *20 CFR 422.135*. Since we collect the information on an as-needed basis, we cannot collect it less frequently. There are no technical or legal obstacles to burden.
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 June 5, 2020 at 85 FR 34703, and we received no public comments. The 30-day FRN published on August 20, 2020 at 85 FR 51540. 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**
Please see the burden chart below:

Modality of Completion	Number of Respondents	Frequency of Response	Average Burden per	Estimated Total Annual	Average Theoretical Hourly	Average Wait Time in	Total Annual Opportun Cost
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			Response (minutes)	Burden (hours)	Cost Amount (dollars)*	Field Office (minutes) **	(dollars)*
SSA-1383	75,000	1	6	7,500	\$7.25*	24**	\$271,87
SSA-1383-FC	805	1	6	81	\$7.25*	24**	\$2,92
Totals	75,805			7,581			\$274,79

* We based this figure on the Federal minimum hourly wage, as reported by Bureau of Labor Statistics data (<https://www.bls.gov/opus/reports/minimum-wage/2019/home.htm>).

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

In addition, OMB’s Office of Information and Regulatory Affairs is requiring SSA to use a rough estimate of a 30-minute, one-way, drive time in our calculations of the time burden for this collection. OIRA based their estimation on a spatial analysis of SSA’s current field office locations and the location of the average population centers based on census tract information, which likely represents a 13.97-mile driving distance for one-way travel. We depict this on the chart below:

Total Number of Respondents Who Visit a Field Office	Frequency of Response	Average One-Way Travel Time to a Field Office (minutes)	Estimated Total Travel Time to a Field Office (hours)	Total Annual Opportunity Cost for Travel Time (dollars)*****
75,805	1	30	37,903	\$274,797

*****We based this dollar amount on the Average Theoretical Hourly Cost Amount in dollars shown on the burden chart above.

Per OIRA, we include this travel time burden estimate under the 5 CFR 1320.8(a) (4), which requires us to provide “time, effort, or financial resources expended by persons [for]...transmitting, or otherwise disclosing the information,” as well as 5 CFR 1320.8(b)(3)(iii) which requires us to estimate “the average burden collection...to the extent practicable.” SSA notes that we do not obtain or maintain any data on travel times to a field office, nor do we have any data, which shows that the average respondent drives to a field office, rather than using any other mode of transport. SSA also acknowledges that respondents’ mode of travel

and, therefore, travel times vary widely dependent on region, mode of travel, and actual proximity to a field office.

NOTE: We included the total opportunity cost estimate from this chart in our calculations when showing the total opportunity cost estimates in the paragraph below.

The total burden for this ICR is **7,581** burden hours (reflecting SSA management information data), which results in an associated theoretical (not actual) opportunity cost financial burden of **\$549,594**. 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 \$189,700. This estimate accounts for costs from the following areas:

Description of Cost Factor	Methodology for Estimating Cost	Cost in Dollars*
Designing, Printing, and Distributing the Form	Design Cost + Printing Cost + Distribution Cost	\$175
SSA Employee (e.g., field office, 800 number, DDS staff) Information Collection and Processing Time	GS-9 employee x # of responses x processing time	\$189,525
Systems Development, Updating, and Maintenance	GS-9 employee x man hours for development, updating, maintenance	\$0
Total		\$189,700

SSA is unable to break down the costs to the Federal government further than we already have. First, since we work with almost every US citizen, we often do bulk mailings, and cannot track the cost for a single mailing. We do not track design costs or upkeep costs (as these are based on employee time and may vary from collection to collection). In addition, it is difficult for us to break down the cost for processing a single form, as field office and State Disability Determination Services staff often help respondents fill out several forms at once, and the time it takes to do so can vary greatly per respondent. As well, because so many employees have a hand in each aspect of our forms, we use an estimated average hourly wage, based on the wage of our average field office employee (GS-9) for these calculations. Finally, SSA prefers not to provide breakdowns of estimated payment to employees who process these items for a variety of reasons (only one of which is that it is not possible to do this entirely accurately).

15. Program Changes or Adjustments to the Information Collection Request

When we last cleared this IC in 2017, the burden was 7,614 hours. However, we

are currently reporting a burden of 7,581 hours. This change stems from a decrease in the number of responses from 76,134 to 75,805. There is no change to the burden time per response. Although the number of responses changed, SSA did not take any actions to cause this change. These figures represent current Management Information data.

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.