## Justification for No material/Nonsubstantive Change Certification by School Official (CM-981)

The Department of Labor's Office of Workers' Compensation Programs (OWCP) is the agency responsible for administration of the Federal Employees' Compensation Act (FECA), 5 U.S.C. 8101 et. seq., the Black Lung Benefits Act (BLBA), 30 U.S.C. 901 et. seq. and the Energy Employees' Occupational Illness Compensation Program Act of 2000 (EEOICPA), 42 U.S.C. 7384 et. seq. These statutes require OWCP to pay for appropriate medical and vocational rehabilitation services provided to beneficiaries. OWCP is requesting an address change to OWCP form 'Certification of School Official' (CM-981) as the OWCP medical bill processor has procured a new mailroom and requires a means to receive the form from school registrars informing OWCP whether or not a coal miner's dependent is attending school full time.

Approval of this request is needed by October 1, 2020 for posting of the form on the medical bill processors web portal. This will allow ample time for the processor's assumption of operations on October 1, 2020. Any approval date beyond October 1, 2020 would necessitate a delay in operations until the request is approved.