

**Justification for Non-Substantive Changes for (SSA FORM- 3820-BK)
Disability Report - Child
CFR Citations
OMB No. 0960-0577**

Terms of Clearance:

OMB placed the following Terms of Clearance on the approval dated 2/16/23:

- 1) The agency made changes to the supporting statement to provide greater detail on how the information collection operates. It also made modifications to the instrument to improve clarity to respondents and reduce burden. Within one year of approval of this ICR, the agency will ensure that all agreed-upon changes to the electronic and paper versions of this collection are implemented and that it conducts a non-substantive change to ensure all instruments are accurately recorded in ROCIS; the agency will inform OMB when it is prepared to take this action.

SSA Response: We are submitting this Change Request within a year of the OMB approval to satisfy this Term. As per this Term, we have updated the information collections under this ICR to implement the agreed-upon changes. We are now conducting the required Change Request to ensure these updated collection instruments are accurately recorded in ROCIS.

- 2) Prior to triannual renewal, the agency will review this ICR for consistency with M-22-10.

SSA Response: We are working on updating the ICR documentation for consistency with M-22-10. When we next submit the full ICR, it will include the necessary, revised information.

Revisions to the Collection Instruments:

As per the information above, we made the following revisions to the collection instruments in accordance with the Terms of Clearance OMB placed on this information collection on 2/16/23:

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- **Change #1:** We are removing the language DO NOT LEAVE ANSWERS BLANK” from the second bullet on the initial cover page,

Justification #1: We are removing the language to address OMB’s concerns from the prior version of the form that this is contradictory to the first and second instructions to leave answers blank until talking with the interviewer.

- **Change #2:** We are revising the language on page 3, Section 3B, which is now on page 5, Section 3B:

- o **Old Language:** When did the child become disabled?
- o **New Language:** When do you estimate the child became disabled? (Use Section 10 - Date and Remarks to provide additional information.)

Justification #2: We are revising the language to address OMB’s concerns that what we are asking is unclear since when a child becomes disabled could be the date of diagnosis, the date the child with a progressive disease became functionally limited, or various other dates based on the background of the individual completing the form. By providing a remarks section, the person completing the form can elaborate when and why they believe the child became disabled.

- **Change #3:** We are revising the language on page 11, Section 9A, which is now on page 13, Section 9A:
 - o **Old Language:** Has the child ever worked (including sheltered work)?
 - o **New Language:** Has the child ever worked (including sheltered employment, which refers to employment provided for individuals with disabilities in a protected environment under an institutional program)?

Justification #3: We are revising the language to provide a description of what sheltered work is.

- **Change #4:** We are revising the language on page 4, Section 4C. which is now on page 6, Section 4C:
 - o **Old Language:** List **each DOCTOR/HMO/THERAPIST/OTHER.** Include the child's **next appointment.**
 - o **New Language:** C. List **each Doctor/HMO/Therapist/Other.** If you cannot remember the exact dates, try to give us approximate dates.- Examples: 12-20-19, Dec. 2019, last winter. Include the child's **next appointment.**

Justification #4: We are revising the language based on OMB’s suggestion to provide this guidance wherever we ask for dates in section 4C on the form.

- **Change #5:** We are revising the language on page 7, Section 6, which is now on page 9, Section 6:
 - o **Old Language:** Has the child had, or will he/she have, any **medical tests** for illnesses, injuries or conditions?
 - o **New Language:** Has the child had, or will the child have, any **medical tests** for illnesses, injuries, or conditions?

Justification # 5: We are revising the language, because he use of “he/she” is not consistent with gender inclusive practices. By removing and/or revising this text will align with gender inclusive language, in which SSA is working on.

- **Change #6:** We are revising the PRA statements on this collection.

Justification #6: We are revising the PRA statements to reflect our current boilerplate language. The current language, which dates back to the last reprint of the form, is now outdated.

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- **Change #7:** We are revising the language in the About the Child tab, following the list of description of all disabling conditions:

- **Old Language:** When did the child become disabled?
- **New Language:** When do you estimate the child became disabled?

Justification #7: We are revising the language to address OMB’s concerns that we what we are asking is unclear since when a child becomes disabled could be the date of diagnosis, the date the child with a progressive disease became functionally limited, or various other dates based on the background of the individual completing the form.

- **Change #8:** We are revising the language under Additional Sources of Testing or Examination. *Note: this change will revise the language on the Summary of [Child Name] Medical History which populates.*

- **Old Language:** Mental Retardation Center
- **New Language:** Mental Health/Developmental Disabilities Center

Justification #8: We are revising the language, because the mental retardation center (MR) language is outdated. The term “Mental Health/Developmental Disabilities Center should replace the prior Mental Retardation language to conform with standard medical terminology.

- **Change #9:** We are revising the language under About [child’s name]’s Testing at a Mental Health or Developmental Disability to reflect the updated language from Change #10. *Note: this change will revise the language on the Summary of [Child Name] Medical History which populates.*

- **Old Language:** Mental Retardation Center
- **New Language:** Mental Health or Developmental Disabilities Center

Justification #9: We are revising the language, because the mental retardation center (MR) language is outdated. The term “Mental Health/Developmental Disabilities

Center should replace the prior Mental Retardation language to conform with standard medical terminology.

SSA will implement these changes upon OMB approval. These revisions will not affect the current burden for this information collection.

Justification for Non-Substantive Changes to the Collection or Resubmission of the Collection within One Year of OMB Approval

We are submitting the non-substantive change request within in One Year of OMB Approval, as required by OMB's Terms of Clearance from 2/16/23. We were delayed in making OMB's requested updates due to system issues with updating the i3820 application, which pertained to both Systems and budget limitations. We are now submitting all of the changes based on OMB's Terms of Clearance, still within the first year of the approval (as per the Terms of Clearance).