

Supporting Statement for Forms SSA-1383 and SSA-1383-FC
Student Reporting Forms
20 CFR 404.352(b)(3) and (4), 404.367, 404.368, 404.415, 404.434, 422.135
OMB No. 0960-0088

A. Justification

1. Introduction/Authoring Laws and Regulations

Per Section 20 CFR 422.135 of the *Code of Federal Regulations*, a recipient of monthly benefits is obligated to report to the Social Security Administration (SSA) the occurrence of certain events which may result in suspension, termination, or adjustment in the payment of benefits. Events that a student beneficiary must report are listed on Forms SSA-1383 and SSA-1383-FC, Student Report Forms. The FC version of this form is for use by students who are outside the United States. Students may use these forms to report changes. Section 202(d) of the Social Security Act sets forth the requirements for entitlement to child's benefits as a student, as well as when benefits begin and end. Sections 202(d), 202(x)(1), and 203(f) of the *Social Security Act* authorizes SSA to collect the information on the SSA-1383. These sections set forth how marriage, change in school attendance, earnings, and incarceration affect a child's continuing entitlement to benefits if the child is a student. Section 20 CFR 404.352(b)(3) 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. Sections 20 CFR 404.415 and 404.434 state that SSA may reduce or suspend benefits 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.

2. Description of Collection

In general, the children of retired, deceased, or disabled beneficiaries who remain full-time students at age 18 are entitled to benefits until they reach age 19 or complete their secondary (grade 12 or below) education, whichever occurs first. To qualify for Social Security Title II student benefits, student beneficiaries must be in full-time attendance status at an educational institution. An educational institution is a school that provides elementary or secondary education (grade 12 or below). To initially demonstrate this and avoid having benefits terminated at age 18, these students must complete SSA-1372-BK, *Student's Statement Regarding School Attendance* (OMB Control Number 0960-0105).

However, in certain circumstances, an event may occur that would result in the reduction, termination, or suspension of a student's benefits. SSA requires beneficiaries to report these events, and SSA uses Forms SSA-1383 and SSA-1383-FC to collect this information and determine if the changes or events the student beneficiaries report will affect their continuing entitlement to SSA benefits or benefit amount. If the student reports work activity, SSA compares

the reported earnings to the annual exempt amount to determine deductions under the earnings test. If the student reports a change in schools, SSA must confirm that the school provides elementary or secondary education (grade 12 or below) as determined under the law of the State or other jurisdiction in which it is located and full-time attendance to continue entitlement as a student. SSA employees administer the information collection (IC) during an in-office or telephone interview, or through receipt of a report by telephone or mail. 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

Respondents to this information collection may orally submit the information, either via an in-person interview with an SSA employee at a field office or a phone-based interview with an SSA employee at a field office or teleservice center. Respondents may also complete the physical form and mail it in. When a respondent submits information orally, the SSA employee will directly enter the information into the Post-entitlement Online System (POS) or Prisoner Update Processing System (PUPS). We use POS to enter information provided by the respondent pertaining to work, marriage, and school attendance. We use PUPS to enter information provided by the respondent pertaining to incarceration or warrant issued for student's arrest. We estimate approximately 80% of respondents submit information orally. When SSA receives a mailed version of the form, an SSA employee will enter the information into POS or PUPS. If a POS input for information collected orally or by mail does not automatically process to update the student's record, a technician must update the student's record manually using the Manual Adjustment Credit and Award Data Entry (MACADE) system. This information collection does not allow for electronic submission as described under GPEA.

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 Response (minutes)	Estimated Total Annual Burden (hours)	Average Theoretical Hourly Cost (dollars)*	Average Wait Time in Field Office (minutes)**	Total Annual Opportunity Cost (dollars)*
SSA-1383	75,000	1	6	7,500	\$7.25*	24**	\$271,875
SSA-1383-FC	805	1	6	81	\$7.25*	24**	\$2,925
Totals	75,805			7,581			\$274,799

* We based this figure on the Federal minimum hourly wage, as reported by Bureau of Labor Statistics data (<https://www.bls.gov/opub/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*
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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.