

Supporting Statement for Forms SSA-1383 and SSA-1383-FC
Student Reporting
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), 202(x)(1), 203(h) and 205(a) of the *Social Security Act* authorize 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. At the time SSA technicians complete the child's application, the technician either hands Form SSA-4-INST, Reporting Responsibilities for Child's Insurance Benefits to the child or their caregiver in-person or sends the form via mail to the respondent. The SSA-4-INST contains language about the respondent's reporting responsibilities and the events SSA needs respondents to report. SSA also gives Form SSA-1372, Student's Statement Regarding School Attendance, to the respondent for completion. SSA technicians instruct the respondents to detach and keep a page of the SSA-1372 advising them of events to report to SSA. We also include and address reporting responsibilities and how to report on SSA's webpage: [Frequently Asked Questions for Students | School Officials | SSA](#). 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.

We identified the following psychological cost based on the requirements for this information collection:

- Requirement for the Program: The SSA-1383 asks individuals to report changes in their circumstances that may cause a reduction, suspension, or termination of their benefits.
- Psychological Cost: Concern over the possibility of a reduction, suspension, or termination of their benefits may be stressful for the individual and keep them from submitting a change in their circumstances. This could affect continued entitlement to, and receipt of, benefits.

We understand psychological costs may cause respondents to delay their completion of the information collection or cause them to abandon the information collection entirely. However, if the individual fails to report events as shown on this information collection, they may not be paid some or all of the benefits due to them, or they may be overpaid, in which case they will have to pay back any benefits they received that were not due to them. Therefore, we have taken this potential psychological cost into account when calculating our burden in #12 below.

The respondents are Social Security Title II student beneficiaries.

3. Use of Information Technology to Collect the Information

SSA maintains fillable PDF copies of these forms on our website. During in-office and telephone interviews, SSA employees enter information directly into the Post-entitlement Online System (POS), Prisoner Update Processing System (PUPS), or the Manual Adjustment Credit and Award Data Entry (MACADE) system. Based on our data, we estimate that technicians use one of these electronic means to collect this information via personal interview from approximately 80% of respondents under this OMB number. The remainder of the respondents use the paper form and mail it back to the field office.

Forms SSA-1383 and SSA-1383-FC are available as fillable PDFs on SSA's website. While we currently do not allow for electronic submission of this information collection as described under the Government Paperwork Elimination Act, we updated the form to remove the signature requirement. Therefore, respondents who complete this form on their own, can complete the form electronically, download it, and either send or bring it to a field office for processing, with no need for a wet signature (or a signature of any kind). Field offices are responsible for receiving and processing this form. We evaluated this collection for conversion to an electronically submittable PDF; however, as we do not know that the student needs to complete this form until they contact us, we ultimately decided not to prioritize this ICR for conversion to fully submittable PDF at this time. In the future we will reassess these forms for conversion to a submittable PDF or for electronic submission. If we determine we will include these forms for electronic submission, we will submit a Change Request to OMB

to request prior approval of the new modality.

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 April 4, 2025, at 90 FR 14891, and we received no public comments. The 30-day FRN published on June 17, 2025, at 90 FR 25734. If we receive any comments in response to this Notice, we will forward them to OMB. We did not consult with the public in the development revision of this form.

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 Field	Total A Oppor Cost
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			Response (minutes)	Burden (hours)	Cost Amount (dollars)*	Office or for Teleservice Centers (minutes) **	(dollar
SSA-1383	8,158	1	6	816	\$7.25*	102**	\$106,
SSA-1383-FC	557	1	6	56	\$7.25*	102**	\$7,
Totals	8,715			872			\$113,

* We based this figure on the Federal minimum hourly wage as reported by Bureau of Labor Statistics data.

** We based this figure on the average FY 2025 wait times for field offices (23 minutes) and teleservice centers (180 minutes), 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)****
8,715	1	30	4,358	\$31,596

****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.

We did not include a separate Learning Cost for this information collection, as we include the Learning Cost in the burdens listed in the chart above.

We base our burden estimates on current management information data, which includes data from actual interviews, as well as from years of conducting this information collection. Per our management information data, we believe that 6 minutes accurately shows the average burden per response for learning about the program; receiving notices as needed; reading and understanding instructions; gathering the data and documents needed; answering the questions and completing the information collection instrument; scheduling any necessary appointment or required phone call; consulting with any third parties (as needed); and waiting to speak with SSA employees (as needed). Based on our current management information data, the current burden information we provided is accurate. The total burden for this ICR is 872 burden hours (reflecting SSA management information data), which results in an associated theoretical (not actual) opportunity cost financial burden of \$145,334. 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 \$282,527. 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	\$1,232
SSA Employee (e.g., field office, 800 number, DDS staff) Information Collection and Processing Time	GS-9 employee x # of responses x processing time	\$25,019
Full-Time Equivalent Costs	Out of pocket costs + Other expenses for providing this service	\$0*
Systems Development, Updating, and Maintenance	GS-9 employee x man hours for development, updating, maintenance	\$256,276

Quantifiable IT Costs	Any additional IT costs	\$0*
Total		\$282,527

* We have inserted a \$0 amount for cost factors that do not apply to this collection.

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 information collection in 2022, the burden was 7,581 hours; however, we are currently reporting a burden of 872 hours. In the prior clearance package, we estimated 75,000 responses, however, we are now reporting significant reduction in usage to only 8,715. These figures represent current Management Information data. Although the number of responses changed, SSA did not take any actions to cause this change. We do not have any data showing a cause for the significant drop in usage of these forms.. There is no change to the burden time per response.

* Note: The total burden reflected in ROCIS is **20,044**, while the burden cited in #12 of the Supporting Statement is **872**. This discrepancy is because the ROCIS burden reflects the following components: the average of both field office and current telephone waiting time + a rough estimate of a 30-minute, one-way, drive burden. In contrast, the chart in #12 of the Supporting Statement reflects actual 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.