

SUPPORTING STATEMENT FOR PAPERWORK REDUCTION ACT SUBMISSION

RI 25-15, Self-Certification of Full-Time School Attendance for the School Year

OMB Control Number: 3206-0042

A. Justification

1. Explain the circumstances of this collection, why this collection is necessary, and the legal statutes that allow it.

Title 5, U. S. Code, Chapter 83, Section 8341(a)(4) and Chapter 84, Section 8441(4) provide that the Office of Personnel Management (OPM) shall determine the continuing eligibility of unmarried, dependent student children between the ages of 18 and 22 to receive survivor annuity benefits. RI 25-15 is used in February and October of each year to collect information from students regarding marital status, current and future for full-time school attendance and to verify that the student has continued the school attendance previously certified to OPM on RI 25-14, Self-Certification of Full-Time School Attendance (3602-0032). Only individuals whose benefits should stop are requested to return the form. OPM is proposing to combine these information collections.

2. Describe how, by whom, and for what purpose the information is to be used. Except for a new collection, describe how the agency has made use of the information received from the current collection.

The modified RI 25-15 is designed to give students an opportunity to inform OPM if they are not or will not be entitled to continue to receive survivor benefits. If this information were not collected, we might continue to pay benefits to persons who are no longer entitled.

3. How are the respondents expected to complete the collection? Can this collection be completed electronically.

This is a personalized form, pre-coded for only the recipient. The form is mailed with a return envelope. The completed form should be mailed to the address located on the form, in the enclosed envelope, or faxed to (202) 606-0022.

Or, emailed to student.surveys@opm.gov.

4. Does this collection duplicate any other collection of information. Describe why the agency doesn't already have this information within their systems.

OPM does not have the requested information, which must be provided by the student. OPM has released a fully digital retirement case processing method. Additionally, OPM has released an online retirement guide and chatbot to improve the annuitant experience.

Retirement Services will use data-driven evaluations to better address annuitant questions and reduce their burden.

5. Describe any impacts on small business. If applicable, describe any methods used to minimize those impacts.

This information collection request has no impact on small businesses and organizations.

6. What are consequences to the Federal program or policy goals if the collection is not done or the information is collected less frequently? Describe any technical or legal obstacles to reducing burden.

This information collection is designed to give students an opportunity to inform OPM if they are not or will not be entitled to continue to receive survivor benefits. Less frequent collections could result in the possibility of unauthorized survivor benefits payments.

7. Do any of the following special circumstances apply?

- requiring respondents to report information to the agency more often than quarterly;
- requiring respondents to prepare a written response to a collection of information in fewer than 30 days after receipt of it;
- requiring respondents to submit more than an original and two copies of any document;
- requiring respondents to retain records, other than health, medical, government contract, grant-in-aid, or tax records, for more than three years;
- in connection with a statistical survey, that is not designed to produce valid and reliable results that can be generalized to the universe of study;
- requiring the use of a statistical data classification that has not been reviewed and approved by OMB;
- that includes a pledge of confidentiality that is not supported by authority established in statute or regulation, that is not supported by disclosure and data security policies that are consistent with the pledge, or which unnecessarily impedes sharing of data with other agencies for compatible confidential use; or
- requiring respondents to submit proprietary trade secrets, or other confidential information unless the agency can demonstrate that it has instituted procedures to protect the information's confidentiality to the extent permitted by law.

There are no special circumstances involved in the collection of this information.
This information collection is consistent with the guidelines in 5 CFR 1320.8(b)(3).

8. Cite the Federal Register publication for a request for public comments and address any comments received.

On June 2, 2025, a 60-Day Federal Register Notice was published at 90 FR 23384 requesting comment. No comments were received.

9. Are payments or gifts given to the respondents?

No gifts or payments of any kind have been provided to any individuals who are connected to this collection.

10. Describe any assurances of privacy/confidentiality. Cite specific privacy laws, relevant OPM regulations and SORNs.

This information collection is protected by the Privacy Act of 1974 and OPM regulations (5 CFR 831.106, 47 FR 12937). The routine uses of disclosure appear in the *Federal Register* for OPM/Central-1 (87 FR 5874, published February 2, 2022).

11. Are any questions of a sensitive nature asked, such as sexual behavior and attitudes, religious beliefs, and other matters that are commonly considered private? If yes, provide justification. This justification should include the reasons why the agency considers the questions necessary, the specific uses to be made of the information, the explanation to be given to persons from whom the information is requested, and any steps to be taken to obtain their consent.

This information collection does not include questions of a sensitive nature, such as sexual behavior and attitudes, religious beliefs, and other matters that are commonly considered private.

12. Describe the hour time burden and the hour cost burden on the respondent needed to complete this collection. Please specify hourly salary for your respondent audience by referencing [Bureau of Labor Statistics Occupational Employment and Wage Estimates](#) or other alternative wage site, when applicable.

Approximately 4,264 forms will be processed annually. The form requires approximately 20 minutes for completion. The annual burden is 1,421 hours. A response is needed only if the student's status has or will change.

Type of Respondent	Form Name	No. of Respondents	No. of Responses per Respondent	Average Burden per Response (in hours)	Hourly Wage Rate	Total Respondent Cost
Student Survivors	<i>Self-Certification of Full-Time School Attendance for the School Year</i>	4,264	1	.3333 hours	\$36.02	\$51,191.31

The total Annual Respondent Cost is \$51,191.31.

13. Describe the non-hourly monetary burden to respondents needed to complete this collection. This is defined as out-of-pocket costs such as application fees for the collection, document fees ([birth/death certificates](#), school transcripts), mailing costs ([printing](#), [postage](#), and/or [mileage](#)), or anything else respondents may need to pay to complete and/or implement the collection.

Form Name	No. of Respondents	Total No. of Responses	Mileage at \$0.70 a mile	Total Mileage Cost per Respondent	Total Non-Hourly Cost
<i>Self-Certification of Full-Time School Attendance for the School Year</i>	4,264	1	9	\$6.30	\$26,863.20

The Total Respondent Cost is \$26,863.20.

14. Describe the cost incurred by the Federal Government to complete this collection.

The annualized cost to the Federal government is \$43,900. This cost is derived from employee salaries, staff hours required to process the forms and the cost of publishing, storing, and shipping forms.

15. Explain any changes/adjustments to this collection since the previous submission, if applicable. Describe whether these changes impact the hour or cost burden. If yes, describe if the impact is the result of deliberate Federal government action (“program change”) or something else (“adjustment”).

There have not been program changes. The hour and cost burden have been adjusted to reflect combining RI-15 and RI-14 into a single form, updates to the number of respondents and the hourly wage cost.

16. Specify the data gathered by this collection will be published. This could include Congressional reporting, using respondent numbers in budget justification, or other broad reporting.

The results of this information collection are not published.

17. If applicable, explain the reason(s) for seeking approval to not display the OMB expiration date.

OPM seeks approval to not display the OMB clearance expiration date on the forms and to communicate version changes to the public via the revision date. OPM has revised the Public Burden Statement so that the public can ensure the collection is active can be used to collect this information via www.reginfo.gov/public/do/PRAMain.

18. Explain each exception to the certification statement identified in Item 19 “Certification for Paperwork Reduction Act Submissions,” of OMB Form 83-I.

There are no exceptions to the certification statement.