

Supporting Statement for Paperwork Reduction Act Submissions

OMB Control Number: 3206-0099, RI 25-41 - *Initial Certification of Full-Time School Attendance*

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 and the implementing regulation (5 C.F.R. Section 831.672) authorizes OPM to pay survivor benefits to children from the Civil Service Retirement System. Title 5, U.S. Code, Chapter 84, Section 8443 and the implementing regulation (5 C.F.R., Section 843.410) authorizes OPM to pay survivor benefits to children from the Federal Employees Retirement System. OPM pays survivor benefits to children of deceased Federal employees and annuitants if the children are between the ages of 18 & 22, unmarried and full-time students in a recognized school.

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.*

RI 25-41 is used by OPM to determine if the child is eligible to receive survivor benefits. If this information were not collected, OPM would be unable to determine whether unmarried dependent children (between 18 and 22 years of age) are eligible to receive survivor benefits.

3. *How are the respondents expected to complete the collection? Can this collection be completed electronically (e.g., through a website or application).*

RI 25-41 is available electronically at www.opm.gov/forms to print, complete and mail to: OPM, Retirement Operations, Attn: Survivor Claims, PO Box 45, Boyers, PA 16017-0045.

As this form needs to be potentially signed by multiple individuals, OPM does not have another option at this time for collecting this information.

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

The information requested on RI 25-41 is unique and is not available from any other OPM information collection or Federal agency source. OPM requires current certification from the student and educational institution to verify eligibility for continued survivor annuity benefits based on full-time school attendance. While OPM maintains annuitant and survivor benefit records, it does not otherwise possess or routinely receive up-to-date information regarding a beneficiary's enrollment status, attendance level, or expected graduation date. Therefore, the information must be collected directly from the respondent and the educational institution to ensure accurate benefit determinations and continued program integrity.

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 this collection is not done or the information is collected less frequently? Describe any technical or legal obstacles to reducing burden.*

The collection of this information is performed as needed to grant the survivor reduction to eligible persons. Less frequent collection would deny this benefit which is provided by law.

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.

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

On March 9, 2026, a 60 Day Federal Register Notice was published at 91 FR 11349 requesting comments. No comments were received.

9. *Are payments or gifts given to the respondent?*

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). 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.

The information collection does not include questions regarding sexual behavior and attitudes or 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 1,200 certifications are processed annually. This form requires approximately 90 minutes to complete. A burden of 1,800 hours is estimated.

Form Name	Form Number	No. of Respondents	No. of Responses per Respondent	Average Burden per Response (in hours)	Total Annual Burden (in hours)	Average Hourly Wage Rate	Total Annual Respondent Cost
Application for Refund of Retirement Deductions (CSRS)	RI 25-41	1,200	1	1.5	1,800	\$32.66	\$58,788

The total Annual Respondent Cost is \$58,788.

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.

USPS estimates that the average driving distance between post offices is around 9 miles. The cost for first class postage in 2026 is \$.73 totaling a cost of \$876.00. Mileage cost in 2026 at a rate of \$.0725 totaling \$783.00.

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

The estimated cost to the Federal government is \$13,750.

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”).

Two questions were added to the form, asking if the respondent had joined the military or transferred from another school. OPM does not expect this to affect the hour and cost burden changes other than what would be reflected in standard inflation changes

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

No information collected from the form will be published.

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

We seek approval to not display the OMB clearance expiration date on the forms and to communicate version changes to the public via the revision date. The results of this collection are not published.

18. *Explain each exception to the topics of the certification statement identified in “[Certification for Paperwork Reduction Act Submissions](#).”*

There are no exceptions to the certification statement.