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Agency Information Collection Activities: Proposed Request

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Comment from Anonymous

Submitter Information

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General Comment

Under 44 U.S.C. § 3506(c) and 5 C.F.R. § 1320.8, SSA must support its burden estimates with an objectively defensible methodology, establish the practical utility of the information collected, and consider whether the collection can be improved or its burden reduced.

First, SSA should explain its valuation methodology. Several collections use average disability benefit payments as an hourly proxy for the opportunity cost of respondents' time, while another averages disability payments and worker wages. A benefit amount is not itself an hourly wage. SSA should disclose the calculations and explain why these figures reasonably measure the opportunity cost of time for the populations concerned.

Third, SSA should clarify the burden and respondent totals for the Georgia SOAR evaluation. The table reports 165 respondents across three instruments despite a project population of 90 individuals. Although respondents may participate in multiple collections, SSA should distinguish unique individuals from instrument-specific respondent counts to avoid ambiguity in the reported totals.



These issues are directly relevant to the accuracy of the burden estimates and the adequacy of SSA's PRA submission. I request that SSA provide the underlying calculations, clarify its assumptions, and revise any estimates that cannot be supported by the administrative record before requesting OMB approval.