

**Supporting Statement for Function Reports - Child
Forms SSA-3375, SSA-3376, SSA-3377, SSA-3378, and SSA-3379
20 CFR 416.912 and 416.924a(a)(2)
OMB No. 0960-0542**

A. Justification

1. Introduction/Authoring Laws and Regulations

Section 1614(a)(3)(A) of the *Social Security Act (Act)*, mandates the Social Security Administration (SSA) consider children disabled under *Title XVI* of the *Act* if they have “a medically determinable physical or mental impairment, which results in marked and severe functional limitations...” Sections 1614(a)(3)(H)(i) and 1631(e)(1)(A) of the *Act* and 20 CFR 416.912 of the *Code of Federal Regulations (Code)* grant SSA the authority to establish requirements for the collection of information to help determine a child’s eligibility under *Title XVI*. We collect information from people who know the child’s daily functioning, including the child’s parent(s), or other primary caregiver(s) (hereinafter, referred to as “parent”), to assess the child’s functional limitations, as discussed in 20 CFR 416.924a(a)(2) of the *Code*.

2. Description of Collection

As part of SSA’s Supplemental Security Income (SSI) disability determination process, we use Forms SSA-3375-BK through SSA-3379-BK to request information from a child’s parent or guardian for children applying for Supplemental Security Income (SSI). The five different versions of the form contain questions about the child’s day-to-day functioning appropriate to a particular age group; thus, respondents use only one version of the form for each child. The adjudicative team (disability examiners and medical or psychological consultants) of State disability determination services offices collect the information on the appropriate version of this form (in conjunction with medical and other evidence) to form a complete picture of the children’s ability to function and their impairment-related limitations. The adjudicative team uses the completed profile to determine: (1) if each child’s impairment(s) results in marked and severe functional limitations; and (2) whether each child is disabled. The respondents are parents and guardians of child applicants for SSI.

3. Use of Information Technology To Collect the Information

In accordance with the agency’s Government Paperwork Elimination Act plan, SSA created an electronic modality through our Electronic Disability Collect System (EDCS). When respondents complete these forms in an interview setting in a field office or via telephone, SSA personnel enter the information provided by the respondents through EDCS. Based on our data, we estimate approximately 90 percent of respondents under this OMB number use the electronic EDCS version. In some instances, however, parents fill out the forms at home on a hard copy and bring

the forms to the field office, which is why SSA created fillable PDF versions of the SSA-3375-BK, and we are working on creating fillable versions of all the forms.

4. Why We Cannot Use Duplicate Information

We coordinated the development and revision of other forms used in childhood disability cases, such as SSA-3820 and SSA-3881, to avoid duplication. SSA does not collect any similar information about a child's daily functioning that we can use in place of information from the child's parent. There are other sources that provide information about a child's functioning, such as teachers. However, the regulations require us to form a complete picture of a child's ability to function, and this would be impossible without consideration of the child's functioning in the home setting.

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

The DDSs collect the information once as part of the initial SSI claims process. We may collect updated information if we conduct a continuing disability review (CDR) regarding a child who already receives SSI payments. If the DDSs did not collect this information on our behalf, it would significantly compromise SSA's ability to make accurate and supportable disability determinations in childhood disability cases. There are no technical or legal obstacles to burden reduction.

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 May 20, 2016 at 81 FR 31999, and we received no public comments. SSA published the second Notice on July 22, 2016, at 81 FR 47845. If we receive comments in response to the 30-day Notice, we will forward them to OMB. We did not consult with the public in the 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

This information collection does not contain any questions of a sensitive nature.

12. Estimates of Public Reporting Burden

When initially applying for SSI on behalf of a child, we ask each respondent (individuals or households only) to provide one response to the form appropriate to the child's age. We may need an additional response if we conduct a CDR of the child's case. Based on the 2015 Annual Report of the Supplemental Security Income Program, approximately 532,000 respondents take 20 minutes to complete forms SSA-3375, SSA-3376, SSA-3377, SSA-3378, and SSA-3379 each year. Accordingly, the burden is 177,333 hours. This figure represents burden hours, and we did not calculate a separate cost burden.

13. Annual Cost to the Respondents

This collection does not impose a known cost burden to the respondents.

14. Annual Cost to Federal Government

The estimated annual cost to the Federal Government is approximately \$4,358,700. This estimate is a projection of the costs for printing and distributing the paper forms, for collecting the information on all five forms, and for completing the EDCS screens at the field offices.

15. Program Changes or Adjustments to the Information Collection Budget

The decrease in the number of respondents for this collection is due to a decrease in use based on our current case data in the 2015 Annual Report of the Supplemental Security Income Program. SSA did not initiate any program changes that would cause a decrease in respondents.

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 (for example, 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. Exemptions 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 will not use statistical methods for this information collection.