SUPPORTING STATEMENT FOR
Certification by School Official

OMB CONTROL NO. 1240-0031

This Information Collection Request (ICR) seeks an extension to the currently approved version.

A. JUSTIFICATION

1. Explain the circumstances that make the collection of information necessary. Identify any legal or administrative requirements that necessitate the collection. Attach a copy of the appropriate section of each statute and regulation mandating or authorizing the collection of information.

To qualify as an eligible dependent or as a claimant in his or her own right under the Black Lung Benefits Act, 30 USC 901-944, a child aged 18 to 23 who does not have a disability must be a full-time student. 30 USC 902(g); 20 CFR 725.209, 725.218. The form CM-981 is used to verify full-time student status.

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

Once a child aged 18 is identified, the claims examiner (CE) determines if the child is a student and obtains the name and address of the school. The CE completes the upper half of the CM-981 and mails it to the school. The school official completes the remainder, signs it, and returns it to DCMWC. The CE reviews it to insure that the dependent or claimant, from the ages of eighteen to twenty-three, is a full-time student. If so, benefits for the dependent or claimant continue to be paid. If the dependent or claimant is not a full-time student, benefits on behalf of the dependent or for the child-claimant will be suspended or terminated.

3. Describe whether, and to what extent, the collection of information involves the use of automated, electronic, mechanical, or other technological collection techniques or other forms of information technology (e.g., permitting electronic submission of responses) and the basis for the decision to adopt this means of collection. Also, describe any consideration of using information technology to reduce burden.

The CM-981 is partially completed by the appropriate district office so that the school official or registrar's office will know for which student and time period the information is being requested. At the time of request, the Central Mail Room address and the District Office telephone number are placed on the form. The partially completed form is sent to the registrar's office together with a return envelope. The information requested is readily available from the registrar. In

accordance with the Government Paperwork Elimination Act (GPEA), this form has also been made available on-line, and may be submitted in one of three different methods if the registrar's office chooses. A) The form may be downloaded, printed, completed by hand, and mailed. B) It may be downloaded, completed on-screen, printed, signed by hand, and mailed. C) The form may also be downloaded, completed by hand/on-screen, printed, signed by hand, and submitted online through the COAL Mine Portal at: https://coalmine.dol.gov/.
It is estimated that 10% of the forms would be submitted utilizing this method. The form is available on the DCMWC public website at https://www.dol.gov/sites/dolgov/files/owcp/regs/compliance/cm-981.pdf. The URL for the form is printed on a brief cover letter that accompanies the CM-981 for use by the Registrar's office in the event that the original form is lost or destroyed before it is returned.

4. Describe efforts to identify duplication. Show specifically why any similar information already available cannot be used or modified for use for the purposes described in Item A.2 above.

There is no similar approved information collection form used by the Black Lung Program. The Federal Employees' Compensation Program and the Social Security Administration collect similar information but from a different beneficiary population.

5. If the collection of information impacts small businesses or other small entities, describe any methods used to minimize burden.

This information does not have a significant impact on a substantial number of small entities.

6. Describe the consequence to federal program or policy activities if the collection is not conducted or is conducted less frequently, as well as any technical or legal obstacles to reducing burden.

If full-time student status for dependents or claimants aged 18 to 23 were verified less than yearly, there would be no dependable way to know if eligibility continues. This could create a hardship to the beneficiary because the monthly benefit check could be less than should be received, or the beneficiary could be paid too much if we incorrectly assumed full-time status. In order to determine continued eligibility, this verification must be done yearly.

7. Explain any special circumstances that would cause an information collection to be conducted in a manner:

- **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 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 secret, 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 for this information collection.

8. If applicable, provide a copy and identify the date and page number of publication in the *Federal Register* of the agency's notice, required by 5 CFR 1320.8(d), soliciting comments on the information collection prior to submission to OMB. Summarize public comments received in response to that notice and describe actions taken by the agency in response to these comments. Specifically address comments received on cost and hour burden.

Describe efforts to consult with persons outside the agency to obtain their views on the availability of data, frequency of collection, the clarity of instructions and recordkeeping, disclosure, or reporting format (if any), and on the data elements to be recorded, disclosed, or reported.

Consultation with representatives of those from whom information is to be obtained or those who must compile records should occur at least once every 3 years -- even if the collection-of-information activity is the same as in prior periods. There may be circumstances that may preclude consultation in a specific situation. These circumstances should be explained.

A Federal Register Notice inviting public comment was published on 12/31/2025 (90 FR 61421)
No comments were received.

DCMWC consulted with two internal and one external representative regarding this information collection request. DCMWC asked these contacts for feedback on burden estimates. None of the three representatives had any changes or comments on the estimated burden, so DCMWC is proceeding with the initial estimates published in the 60-day notice. The individuals/organizations consulted about the information collection are listed in the table below.

Table 1: List of Internal and External Representatives

Contact	Organization	Email	Phone
Natalia XXX	Management and Program Analyst	XXX	XXX
Libby XXX	Hazard Technical College Registrar	XXX	XXX
Marcela XXX	Claims Policy Analyst, Branch of Policy Analysis and Program Standards	XXX	XXX

9. Explain any decision to provide any payments or gifts to respondents, other than remuneration of contractors or grantees.

No payments or gifts are made to respondents to furnish the information**.**

10. Describe any assurance of confidentiality provided to respondents and the basis for the assurance in statute, regulation, or agency policy.

Since the completed form is maintained in the beneficiary's case file, the information collected is covered by the Privacy Act System of Records, DOL/OWCP-2, published at 81 Federal Register 25765, 25858 (April 29, 2016), or as updated and republished**.**

11. Provide additional justification for any questions of a sensitive nature, such as sexual behavior and attitudes, religious beliefs, and other matters that are commonly considered private. 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 collection contains no questions of a sensitive nature.

12. Provide estimates of the hour burden of the collection of information. The statement should:

- **Indicate the number of respondents, frequency of response, annual hour burden, and an explanation of how the burden was estimated. Unless directed to do so, agencies should not conduct special surveys to obtain information on which to base hour burden estimates. Consultation with a sample (fewer than 10) of potential respondents is desirable. If the hour burden on respondents is expected to vary widely because of differences in activity, size, or complexity, show the range of estimated hour burden, and explain the reasons for the variance. Generally, estimates should not include burden hours for customary and usual business practices.[1]**

- **If this request for approval covers more than one form, provide separate hour burden estimates for each form.**

- **Provide estimates of annualized cost to respondents for the hour burdens for collections of information, identifying and using appropriate wage rate categories. The cost of contracting out or paying outside parties for information collection activities should not be included here. Instead, this cost should be included in Item 13.**

Estimated Annualized Respondent Cost and Hour Burden

Activity	No. of Respondents	No. of Responses per Respondent	Total Responses	Average Burden (Hours)	Total Burden (Hours)	Hourly Wage Rate	Monetized Value of Respondent Time
OWCP Form CM-981	195	1	195	0.167 (10 m)	33	$36.86	$1,216

OWCP estimates that it takes the school's registrar about 10 minutes to retrieve the needed information, complete, mail the CM-981, and replace the records. OWCP estimates that 195 CM-981's are filed annually for a total of 33 burden hours.

195 10/60 = 33 (32.56 hours rounded up)

The estimated hourly cost to the respondents is $36.86 per hour (Employment and Earnings, Table B) for August 2025 by the Bureau of Labor Statistics: for the collection of this information for an approximate total of $1,216. https://www.bls.gov/web/empsit/ceseesummary.htm

$36.86 x 33=$1,216.38 (rounded down)

[1] Indicate the retention period for any recordkeeping requirements that pertain to the ICR.

13. Provide an estimate of the total annual cost burden to respondents or recordkeepers resulting from the collection of information. (Do not include the cost of any hour burden shown in Items 12 and 14).

- **The cost estimate should be split into two components: (a) a total capital and startup cost component (annualized over its expected useful life); and (b) a total operation, maintenance and purchase of service component. The estimates should take into account costs associated with generating, maintaining, and disclosing or providing the information. Include descriptions of methods used to estimate major cost factors including system and technology acquisition, expected useful life of capital equipment, the discount rate(s), and the time period over which costs will be incurred. Capital and start-up costs include, among other items, preparations for collecting information such as purchasing computers and software; monitoring, sampling, drilling and testing equipment; and record storage facilities.**

- **If cost estimates are expected to vary widely, agencies should present ranges of cost burdens and explain the reasons for the variance. The cost of purchasing or contracting out information collection services should be a part of this cost burden estimate. In developing cost burden estimates, agencies may consult with a sample of respondents (fewer than 10), utilize the 60-day pre-OMB submission public comment process and use existing economic or regulatory impact analysis associated with the rulemaking containing the information collection, as appropriate.**

- **Generally, estimates should not include purchases of equipment or services, or portions thereof, made: (1) prior to October 1, 1995, (2) to achieve regulatory compliance with requirements not associated with the information collection, (3) for reasons other than to provide information or keep records for the government or (4) as part of customary and usual business or private practices.**

Respondent's cost to mail each response is estimated at ¢83 (¢78 stamp plus ¢05 for the envelope); each beneficiary will receive a mailed response. Responses mailed to beneficiaries will have a respondent cost of $161.85 (195 x¢ 83¢ = $161.85).

Of the 195 responses that will be sent to DCMWC, it is estimated that 10% will be submitted electronically through the COAL Mine Portal (195 x 10% = 19.5). The estimated savings of the forms submitted through the COAL mine portal is $16.18 (19.5 x¢ 83=$16.18). The remaining 175.5 responses will be mailed to DCMWC with a respondent cost of $145.66 (175.5 x ¢83 = $145.66).

Therefore, the total respondent cost is **$146.00** (rounded up) ($161.85-$16.18 = **$**145.67).

There are no other known operating or maintenance costs associated with this collection.

14. Provide estimates of the annualized cost to the Federal Government. Also, provide a description of the method used to estimate cost, which should include quantification of hours, operational expenses (such as equipment, overhead, printing, and support staff), and any other expense that would not have been incurred without this collection of information. Agencies also may aggregate cost estimates from Items 12, 13, and 14 into a single table.

The estimated total cost to the Federal Government for the 195 forms is approximately $**1,779.12** The cost is calculated as follows:

a. Estimated mailing cost: $144.30 (¢.69 metered postage plus $.05 per envelope =¢ .74) 195 forms x ¢ .74= $144.30.

b. The estimated processing cost: $1,634.82 calculated at one CE (GS-12/6) at $49.54 per hour spending about 10 minutes completing and evaluating 195 forms. https://www.opm.gov/policy-data-oversight/pay-leave/salaries-wages/salary-tables/pdf/2025/RUS_h.pdf (The Salary Table 2025-GS was used for the hourly wages.)

195 x 10/60 = 33 (32.55 hours rounded up)

33 x $49.54 = $1,634.82

Total cost: $144.30+$1,634.82 = $**1,779.12**

15. Explain the reasons for any program changes or adjustments.

The estimated number of forms increased as well as the respondent burden hours. There are more eligible dependents attending school full-time.

<u>EXPLANATION OF CHANGE TOTALS</u>

<u>Respondents</u>: The number of respondents increased from 93 to 195.

The following also increased due to an increased number of forms received/responses.

<u>Responses</u>: Responses have increased from 93 to 195 due to the increase in respondents.

<u>Burden Hours</u>: Burden hours have increased from 16 to 33 also due to the increase in respondents.

<u>Costs to Respondents</u>: Annual burden costs have increased from $53.00 to $146.00 due to an increase in postage.

16. For collections of information whose results will be published, outline plans for tabulations, and publication. Address any complex analytical techniques that will be used. Provide the time schedule for the entire project, including beginning and ending dates of the collection of information, completion of report, publication dates, and other actions.

There are no plans to publish this collection of information.

17. If seeking approval to not display the expiration date for OMB approval of the information collection, explain the reasons that display would be inappropriate.

This ICR does not seek a waiver from the requirement to display the expiration date.

18. Explain each exception to the certification statement.

There are no exceptions to the certification statement.

B. COLLECTIONS OF INFORMATON EMPLOYING STATISTICAL METHODS.

Statistical methods are not used in these collections of information.