

**Addendum for Form SSA-1372-BK and SSA-1372-BK-FC  
Advance Notice of Termination of Child's Benefits and  
Student's Statement Regarding School Attendance  
20 CFR 404.350-404.352, 404.367-404.368  
OMB No. 0960-0105**

**Terms of Clearance**

OMB placed the following Terms of Clearance on this Information Collection when they last approved it on 4/17/23:

**Term #1:**

The agency revised the burden estimates and made significant modifications to the supporting statement to clarify how the information is conducted and to clarify why certain elements of the information are collected.

**Term #2:**

Prior to resubmission, the agency will ensure this form can be signed (including via typed signature) by all parties and submitted by the respondent electronically via Document Submission or a successor platform. If the agency determines this is not feasible, it will upload as part of the supplemental documentation a fact-specific explanation for why, from a policy, statutory, and operational perspective, this information collection cannot accommodate electronic signature. This letter should be signed by a Deputy Commissioner.

**Term #3:**

The agency will also evaluate, including a quantified analysis of the potential trade-offs, whether it can remove the school official's certification requirement for most recipients and instead use the respondent's self-allegation. If the agency determines it is unable to remove the requirement for a school official's certification, it will explain via a supplemental document a fact-specific analysis of the risks or trade-offs that informed the agency's decision to retain the requirement.

**SSA Response:**

- **Term #1 (Revisions to burden estimates and modifications to the documentation):**  
SSA has maintained the revisions we made previously. While we are currently updating the burden again, that stems from a routine decrease in the number of respondents, as per our current Management Information data. We explain this minor reduction in #15 of the Supporting Statement.
- **Term #2 (Electronic Signatures and Submissions):**  
Since this form must be completed and signed by multiple parties (i.e., the student/representative payee as well as a school official certifying the student's full-time attendance in school), it has not been feasible to make the form electronically signable and submittable. Upload Documents, our online platform for electronic form submissions, cannot currently accommodate third party signatures. The agency is exploring an enhancement to allow that capability. Once implemented, we will reassess whether these forms could be made electronic.

- **Term #3 (Removal of School Official Certification):**

We disagree with removing the requirement for a school official to certify the student's full-time attendance in school due to the high risk of improper payments or programmatic fraud. Absent a school official's verification, the student could easily allege false information (or unintentionally misrepresent) their school attendance to continue receiving benefits. In our experience stewarding this program, students commonly underreport – whether intentionally or unintentionally – lapses or cessations in full-time school attendance. By maintaining certification from a school official who has access to the student's most accurate school attendance records, we mitigate the risk of overpaying someone who is not eligible for payments because they are not enrolled full-time in school.

Susan Wilschke for Mark Steffensen, Chief of Law & Policy

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Name/Position of Approving Official