



Achieve with us.

October 18, 2021

Kilolo Kijakazi
Acting Commissioner
Social Security Administration
6401 Security Boulevard
Baltimore, MD 21235-6401

Submitted via www.regulations.gov

Re: Response to SSA's Agency Information Collection Activities: Proposed Request, 86 FR 46307 (August 18, 2021), Docket No: SSA-2021-0029

Dear Acting Commissioner Kilolo Kijakazi:

We write in response to the Social Security Administration's (SSA's) burden estimate regarding the time it takes to complete Form SSA-454-BK or the Continuing Disability Review (CDR) form. There comments are submitted on behalf of The Arc of Florida. Our organization serves people with disabilities and the burden put on family members and those that help fill out this form and we disagree with the SSA's estimate.

It seems all we do is fill out forms these days and we need to simplify these forms. Please stop these burdens that keep coming to those we serve.

- In particular, we represent people with intellectual and developmental disabilities. Many of our constituents cannot fill out the form on their own. Instead, they rely on family, friends, or service providers. It is not simply completing the form, but finding help that takes time.
- The form is 15 pages long with multiple narrative questions about the beneficiary's medical treatment, including many details that the beneficiary or those assisting them might not know without assistance from treating health care professionals.
- It is not reasonable to say it takes only an hour to fill out the form.

Please reconsider and revise the estimate and also simplify the form to reduce burden on families. Thank you for the opportunity to comment on this form.

Sincerely,

Alan Abramowitz
Chief Executive Officer
The Arc of Florida