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Comment from Johnson, Thomas

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General Comment

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:

I'm writing to respond 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. Having assisted loved ones in preparing their materials I disagree with SSA's estimate of one hour. It is almost comical to think of SSA releasing such an estimate.

In particular my help has been to those with intellectual and developmental disabilities. The form is 15 pages long with multiple narrative questions about the beneficiary's medical treatment, including details the beneficiary or those assisting them might not know without assistance from treating medical professionals.

The form can take hours to prepare from people with disabilities and their families, but the amount of time varies depending on conditions and resources. I can confidently say one hour is an entirely inaccurate estimate of the time burden of this form. Multiple days is more the norm.

I hope SSA will revise its burden estimate, simplify this form, and reduce the burden it places on people with disabilities and their family, friends, and service providers.

Thanks for the opportunity to comment.

Sincerely,

Thomas Johnson