

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. These comments are submitted on behalf of myself. I am multiply disabled and I disagree with SSA's estimate.

- In particular, I've had 3 TBIs. I cannot fill out this form on my own. Instead, they rely on my case manager. It is not simply completing the form, but arranging help that takes time.
- The form is 15 pages long with multiple narrative questions about my medical treatment, including many details that we don't know without assistance from my PCP and health clinic, all of whom have behaved in transphobic ways, and who I can't trust to accurately put down my history. Both my case manager, specialists, and I have found that they have put inaccurate details in my health record; fixing these takes far more than an hour.
- The form can require hours of work, but the amount of time varies depending on conditions and resources. I can strongly say that 1 hour

is a completely inaccurate estimate of the time burden of this form.

We hope SSA will revise their burden estimate and take steps to simplify this form and reduce the burden it places on people with disabilities.

Thank you for the opportunity to comment on this form.

Sincerely,

Turlach Wilks