

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 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. I am submitting these comments on behalf of The Arc of New Jersey, a disability advocacy organization that serves individuals with intellectual and developmental disabilities (IDD) throughout New Jersey. We strongly disagree with SSA's estimate of the amount of time required to complete this form. In most cases, because of the individual's disability, it is the family members, friends, or service providers who must complete this form because individuals with IDD are not able to do so on their own.

The CDR is a lengthy, 15-page form, with multiple narrative questions about the beneficiary's medical treatment, and it requires details that the beneficiary or those assisting them might not know without contacting their health care providers. Health care professionals often cannot respond quickly to requests for the medical documentation needed for the CDR form because they are busy providing direct care to other patients.

It is not accurate to state that the CDR form can be completed in one hour. Depending on the severity of the individual's disability, and the number of health care providers who need to provide up-to-date information, it can require hours of work on the part of family members, friends, or service providers to complete 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 and their family, friends, and service providers.

Thank you for the opportunity to comment on this Proposed Request.



Achieve with us.

Kevin Sturges, President
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Sincerely,

Thomas Baffuto

Thomas Baffuto
Executive Director