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

October 18, 2021

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 Oklahoma. Our organization serves people with disabilities and family members who must complete this form and we must disagree with SSA's estimate.

Many of our clients with IDD 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. The form can require hours of work from people with disabilities and their families, but the amount of time varies depending on conditions and resources. We can confidently say that one 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 and their family, friends, and service providers.

Thank you for the opportunity to comment on this form.

Sincerely,

A handwritten signature in black ink, appearing to read 'Lisa Turner'.

Lisa Turner, Chief Executive Officer
The Arc of Oklahoma