



CONNECTICUT
LEGAL
RIGHTS
PROJECT, INC.

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 am writing today 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 submit these comments on behalf of Connecticut Legal Rights Project. CLRP is a statewide nonprofit that provides legal representation to people who are eligible for mental health services from the State of Connecticut Department of Mental Health and Addiction Services. We provide representation to people who have applied for SSI or SSDI benefits and been denied, and have assisted people whose benefits have been discontinued after a continuing disability review. Therefore, we have experience in serving people with mental health disabilities who must complete this form. We strongly disagree with SSA's estimate of the time needed to fill out this form.

The continuing disability review form is 15 pages long, consisting of 2 pages of dense instructions and 13 pages of detailed questions. People living with mental health conditions often experience significant stress in reaction to the receipt of official government documents and may lack the capacity to respond immediately. They often have to seek help from family, friends or service providers in order to complete the form. This search for help often takes longer than one hour.

The form includes 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. Treating health care professionals likely do not have time available to answer all of an individual's questions about this form.

Completion of this form can require hours of work from people with disabilities and their families. The amount of time needed will vary depending on an individual's health condition and the resources available to them. I am confident in asserting that a single 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 on beneficiaries and their family and friends.

Thank you for the opportunity to comment on this form.

Sincerely,

A handwritten signature in cursive script that reads "Kathleen M. Flaherty".

Kathleen Flaherty
Executive Director