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Comment from The Arc of Northern Virginia

Submitter Information

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Organization: The Arc of Northern Virginia

General Comment

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 Northern Virginia and the families we serve. We work with people with developmental disabilities across the full lifespan. Our team includes free information and referral specialists, staff to help families make the move from child to adult services, and Case Managers for Medicaid Waiver. In many of our roles, we serve people with disabilities and family members who must complete this form and we must strongly disagree with SSA's estimate.

In particular, we represent people with intellectual and developmental disabilities. Many of our constituents 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. Many individuals do not have someone in their life who is readily able and equipped to help with the form, leading to stress and delays.

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. Much of this information is duplicative from what people submitted when the applied and that history will never change and their developmental disability will never go away.

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 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 and their family, friends, and service providers.

Thank you for the opportunity to comment on this form.

Sincerely,
Lucy Beadnell on behalf of The Arc of Northern Virginia