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Agency Information Collection Activities: Proposed Request

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Comment from BRENNERWARD, ISIS

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General Comment

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. These comments are submitted on behalf of myself and my severely disabled son, Sam Brenner-Ward. I must disagree with SSA's estimate.

- My son has intellectual and developmental disabilities and cannot fill out the form on his own. Instead, he relies on family, friends, or service providers. It is not simply completing the form, but finding help that takes time. Also, filling extra forms and going to extra appointments is an undue extra burden.
- 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 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, Isis Brenner-Ward of Ukiah, CA