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Agency Information Collection Activities: Proposed Request

Comment On: SSA-2021-0029-0001

Agency Information Collection Activities: Proposed Request

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Comment from Munoz-Bergman, Sheryl

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General Comment

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. As the parent and conservator of two disabled young adults, I disagree with SSA's estimate.

Especially as we parents age and die, many disabled adults have tremendous difficulty filling out the forms and advocating with medical professionals for them to complete the medical history information. The way SSA communicates with people who have intellectual and development disabilities is completely inappropriate, regularly threatening to eliminate needed benefits if responses are not provided in a timely and specific way.

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/caregivers, but the amount of time varies depending on conditions and resources. I can confidently say that 1 hour is a completely inaccurate estimate of the time burden of this form.

I 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. I also hope that SSA will use less threatening and more person-friendly language in its communication with recipients.

Thank you for the opportunity to comment on this form.

Sincerely,

Sheryl Munoz-Bergman