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Sent: Thursday, December 15, 2011 9:15 PM
To: OPLM.RCO@ssa.gov; FN-OMB-OIRA-Submission
Subject: Comments Regarding SSA forms HA 1151 and HA 1152 Revised

I am writing as a private citizen after consulting with three colleagues in the Tennessee Legal Aid community, Russ Overby, Theresa Vay-Smith and Katie Evans as well as myself. We have at least 50 combined years experience in Social Security Disability law practice. Thank you for the opportunity to comment regarding the proposed revisions to forms HA-1151 and HA-1152, medical source statement forms used by the Social Security Administration.

Concerning form HA 1151, we suggest that the following language "Identify the particular medical or clinical findings (i.e., physical exam findings, x-ray findings, laboratory test results, history, and symptoms including pain, etc.) which support your assessment or any limitations and why these findings support the assessment." be placed in the prefatory instruction section located immediately above Roman numeral I. We would suggest that you consider adding "entire" after your and "or all" after any .We want treating physicians to complete these forms; the chances of completion will be enhanced if narrative requirements are less burdensome. The form, as presented, is likely to require longer to complete than the 15 minutes assigned it in the Paperwork Reduction Act section.

Similarly, concerning form HA 1152, we suggest moving the following language "Identify the factors (e.g., the particular medical signs, laboratory findings, or other factors described above) that support your assessment." to the prefatory instruction section of the form for the same reason cited above. Also, we would ask that the vocationally and medically relevant limitations listed in POMS (Programs Operations Systems) DI 24505.025 *Evaluation of Mental Impairments* and form SSA-4734-F4-Sup be added to form HA 1152.

Finally, we ask that the Social Security Administration require that all state Disability Determination Sections send these forms to all treating physicians.

Respectfully, Beth Stricklin Bates, 35 Walnut Grove Cove, Jackson,TN 38305; 731 427-0465.