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Thank you for your recent comments regarding the Federal Register Doc# 2018-25901, Standard Form (SF) 3104, Application for Death Benefits under the Federal Employees Retirement System; and SF 3104B, Documentation and Elections in Support of Application for Death Benefits When Deceased was an Employee at the Time of Death. Our response to your comments are as follows:

1. Evaluate whether the proposed collection of information is necessary for the proper performance of functions of the agency, including whether the information will have practical utility.

As you state, a Federal employee has the right to select any individual as the designated beneficiary to receive any unpaid retirement benefits. By law, the employee may choose an individual whether related or not, or name an organization or party as the administrator of his/her estate. The OPM does not require that the employee elect the designated beneficiary based on making funeral arrangements. In our experience, we have no examples of an inability to verify the death of the employee.

2. Evaluate the accuracy of the agency's estimate of the burden of the proposed collection of information including the validity of the methodology and assumptions used.

In general, we estimate that collecting information to complete the application for death benefits may take 60 minutes. We understand that obtaining a death certificate may take longer than an hour. An individual is instructed to submit the death certificate along with the application for death benefits. In this regard, an applicant has 30 years in which to apply for death benefits.

3. Enhance the quality, utility, and clarity of the information to be collected..

All of our forms are updated under the Americans with Disabilities act. Therefore, if the individual has a need for bigger font, there are options available.

4. Minimize the burden of the collection of information on those who are to respond, including through the use of appropriate automated, electronic, mechanical, or other technological collection techniques or other forms of information technology, e.g. permitting electronic submissions of responses.

We find that our instructions are clear and in many cases self-explanatory. We are limited in the ability to provide pop-up videos, visual aids and online chat options.