

January 2007

**SUPPORTING STATEMENT FOR FORM SSA-2528
APPLICATION FOR BENEFITS UNDER THE ITALY-U.S.
INTERNATIONAL SOCIAL SECURITY AGREEMENT**

20 CFR 404.1925

OMB No. 0960-0445

A. Justification

1. *Section 233 (a) of the Social Security Act* authorizes the President to enter into International Social Security Agreements between the United States and foreign countries. Under such agreements, retirement (old-age), survivors, disability and derivative benefits may be based on combined periods of coverage in both agreement countries.

20 CFR 404.1925 provides that an application for benefits filed with the authorities of a country with which the United States has such an agreement shall be considered an application for benefits under the U.S. Social Security system provided the applicant expresses or implies intent to claim benefits from the United States.

The United States and Italy entered into an agreement on November 1, 1978. Article 19.2 of that agreement provides that an applicant for benefits can file his application with either country. Article 4.3 of the Protocol to the Agreement provides that the country that receives the application will forward agreed upon forms and applications to the other country. Form SSA-2528 is the form agreed upon that is completed by individuals who file an application for U.S. benefits directly with one of the Italian Social Security Agencies.

2. The information on Form SSA-2528 is used by the Social Security Administration (SSA) is used to establish such things as age, relationship, citizenship, marriage, death, military service, or to evaluate a family bible or other family record, when determining eligibility for benefits.
3. Improved information technology to reduce the burden is not available. Form SSA-2528 is used exclusively outside the United States and the volume of usage is so small (200 annually) that the cost of developing an automated or electronic form cannot be justified. Also, the form was exempted from the requirements of the Government Paperwork Reduction Act (GPEA) because the form is used only

outside the United States and the low usage volume. This form contains personal and case-specific data which cannot be made available on the Intranet. Until more secure methods exist to safeguard any electronic data transmission from Italy, SSA will not be able to make it electronic since the intake can only occur if there is functional equivalency and secure methods on the backend to receive and process the electronic submission. SSA has reduced the burden on the public in Italy, by providing direct person-person assistance while completing Form SSA-2528 at local Italian Social Security offices.

4. The nature of the information being collected and the manner in which it is collected preclude duplication. There is no other collection instrument used by SSA that collects data similar to that collected here.
5. The collection does not have a significant impact on a substantial number of small businesses or other small entities.
6. Collection of the information takes place based upon the individual's need to apply for benefits. If the information were not collected, the applicant would be unable to file a claim for U.S. Social Security benefits directly with an agency in Italy or for SSA to determine eligibility for benefits.
7. There are no special circumstances that would cause this information collection to be conducted in a manner that is not consistent with 5 CFR 1320.5.
8. The first Federal Register notice was published on February 20, 2007 at 72 FR 7809. We have received no comments from the public as a result of this notice. The second notice was published on April 23, 2007 at 71 FR 20154. The application was developed jointly with officials of Italy representing the Italian social security system. Meetings were held in July 1985 with:

Dr. Salvatore Randisi
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Istituto Nazionale della Previdenza Sociale, (INPS)

Dr. Dario Bosso
Technical Assistant, INPS

Dr. Lamberto Lommi
Technical Assistant, INPS

In addition, written concurrence was obtained from the Ministro del Lavoro e della Previdenza Sociale. There were no major problems left unresolved. No other public comments were solicited.

Meetings were also held in May 1988 between representatives of the Ministry of Labor and Social Insurance, INPS and the Social Security Administration at which time the form SSA-2528 was again reviewed.

9. SSA provides no payment or gifts to the respondents.
10. The information requested is protected and held confidential in accordance with 42 U.S.C. 1306, 20 CFR 401 and 402, 5 U.S.C. 552 (Freedom of Information Act), 5 U.S.C. 552a (Privacy Act of 1974) and OMB Circular No. A-130.
11. The information collection does not contain any questions of a sensitive nature.
12. Form SSA-2528 is used by approximately 200 Individuals/Household respondents annually. There are no respondents from the Private Sector, State/Local/Tribal Government and Federal Government. The estimated average response time is 20 minutes for a total of 67 burden hours. The total burden is reflected as burden hours, and no separate cost burden has been calculated.
13. There is no known cost burden to the respondents.
14. The annual cost to the Federal Government for this collection of information is approximately \$650.00. This estimate is a projection of the costs for printing and distributing the collection instrument and for collecting the information.
15. There have been no program changes or adjustments in this form, and there is no change in the public reporting burden.
16. The results of the information collection will not be published.
17. OMB has granted SSA an exemption from the requirement that the expiration date for OMB approval be printed on its program forms. SSA produces millions of public-use forms, many of which have a life cycle longer than that of an OMB clearance. SSA does not periodically revise and reprint its public-use forms, (e.g., on an annual basis). This exemption was granted so that otherwise useable editions of forms would not be taken out of circulation because the expiration date had been reached. In addition, Government waste has been avoided because stocks of forms will not have to be destroyed and reprinted.
18. SSA is not requesting an exception to the certification requirements at 5 CFR 1320.9 and related provisions at 5 CFR 1320.8(b)(3). Please note, however, that information technology cannot be used for this information collection.

B. Collections of Information Employing Statistical Methods

Statistical methods are not used for this information collection.