

**Supporting Statement for Form SSA-2528  
Application for Benefits Under the Italy-U.S.  
International Social Security Agreement**

**OMB No. 0960-0445**

**A. Justification**

- 1. Introduction/Authoring Laws and Regulations** - Section 233 (a) of the *Social Security Act* authorizes the President of the United States to enter into international Social Security agreements between the United States and foreign countries. Under such agreements, both agreement countries may combine periods of coverage to help individuals qualify for retirement (old age), survivors, disability, and derivative benefits.

The *Code of Federal Regulations* at 20 CFR 404.1925 provides that the Social Security Administration (SSA) will consider an application for Social Security benefits filed with the authorities of a foreign country (where the United States has an agreement) as an application for benefits under the U.S. Social Security system. However, for SSA to consider the application, the applicant must express or imply intent to claim benefits from the United States. We are collecting this information from individuals based on the November 1, 1978 agreement between the United States and Italy. Article 19.2 of the agreement provides that an applicant for benefits may file an application with either country. Article 4.3 of the agreement provides that the country receiving the application will forward agreed-upon forms and applications to the other country. The applicant must express or imply intent to claim benefits from the United States.

- 2. Description of Collection** – As per the November 1, 1978 agreement between the United States and Italian Social Security agencies, residents of Italy filing an application for U.S. Social Security benefits directly with one of the Italian Social Security agencies must complete Form SSA-2528. SSA uses Form SSA-2528 to establish age, relationship, citizenship, marriage, death, military service, or to evaluate a family bible or other family record when determining eligibility for U.S. benefits. The Italian Social Security agencies assist applicants in completing Form SSA-2528 and then forward the application to SSA for processing. The respondents are individuals living in Italy who wish to file for U.S. Social Security benefits.
- 3. Use of Information Technology to Collect the Information** - SSA did not create an electronic version of the form under the agency's Government Paperwork Elimination Act (GPEA) plan because claimants only use this form outside the United States and the low usage volume. The usage volume is less than the GPEA cut-off of 50,000.

4. **Why We Cannot Use Duplicate Information** - The nature of the information we are collecting and the manner in which we collect it preclude duplication. SSA does not use another collection instrument to obtain similar data.
5. **Minimizing Burden on Small Respondents** - This collection does not affect small businesses or other small entities.
6. **Consequence of Not Collecting Information or Collecting it Less Frequently** - SSA only collects the information based upon an individual's need to apply for U.S. Social Security benefits. If SSA did not collect the information, the applicant would be unable to file a claim for U.S. Social Security benefits directly with an agency in Italy. We would be unable to determine the applicant's eligibility for benefits if we did not collect the information or collected it less frequently. There are no technical or legal obstacles to burden reduction.
7. **Special Circumstances** - There are no special circumstances that would cause SSA to conduct this information collection in a manner inconsistent with 5 CFR 1320.5.
8. **Solicitation of Public Comment and Other Consultations with the Public** - SSA published the 60-day advance Federal Register Notice on December 26, 2012 at 77 FR 76160, and we received no public comments. SSA published the second Notice on March 30, 2013, at 78 FR 17276. If we receive any public comments in response to our second Notice, we will forward them to OMB. There have been no outside consultations with members of the public.
9. **Payment of Gifts to Respondents** - SSA does not provide payments or gifts to the respondents.
10. **Assurances of Confidentiality** - SSA protects and holds confidential the information we collect 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. **Justification for Sensitive Questions** - The information collection does not contain any questions of a sensitive nature.
12. **Estimates of Public Reporting Burden** - Approximately 300 respondents use Form SSA-2528 annually. The estimated average response time is 20 minutes for a total of 100 annual burden hours. The figure represents burden hours, and we did not calculate a separate cost burden.
13. **Annual Cost to Respondents** - This collection does not impose a known cost burden on the respondents.

14. **Annual Cost to Federal Government** - The annual cost to the Federal Government is approximately \$650. This estimate is a projection of the costs for printing and distributing the collection instrument and for collecting the information.
15. **Program Changes or Adjustments to the Information Collection Request** - When we last cleared this information collection in 2010, the burden was 83 hours. However, we are currently reporting a burden of 100 hours. This change stems from an increase in the number of respondents who complete this form.
16. **Plans for Publication Information Collection Results** - SSA will not publish the results of the information collection.
17. **Displaying the OMB Approval Expiration Date** - OMB granted SSA an exemption from the requirement to print the OMB expiration date on its program forms. SSA produces millions of public-use forms with life cycles exceeding those of an OMB approval. Since SSA does not periodically revise and reprint its public-use forms (e.g., on an annual basis), OMB granted this exemption so SSA would not have to destroy stocks of otherwise useable forms with expired OMB approval dates, avoiding Government waste.
18. **Exception to Certification Statement** - 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).

**B. Collections of Information Employing Statistical Methods**

SSA does not use statistical methods for this information collection.