

**Supporting Statement for Form SSA-2010
Statement for Determining Continuing
Entitlement for Special Veterans Benefits (SVB)**

OMB No. 0960-0782

A. Justification

1. Introduction/Authoring Laws and Regulations

Title *VIII* of the *Social Security Act (Act)* provides for the payment of Special Veterans benefits to certain World War II veterans who reside outside the United States. Section *203(c)* of the *Act* requires the Commissioner of the Social Security Administration (SSA) to make deductions from benefits of entitled individuals who engage in remunerative activity outside the United States in excess of set limits. Section *203(g)* of the *Act* allows the Commissioner to impose penalty deductions on benefits of individuals who fail to make timely reports of events that are cause for deductions. Section *205(a)* of the *Act* empowers the Commissioner to make rules and regulations and determine an individual's continuing eligibility for benefits.

2. Description of Collection

SSA collects information on Form SSA-2010 to review continuing benefit eligibility to Special Veterans benefits. We need this information to determine continuing entitlement to Social Security special veterans benefits (SVB) and the proper benefit amounts for beneficiaries living outside the United States. SSA distributes the form to all SVB beneficiaries in current pay status. Beneficiaries age 90 and above complete Form SSA-2010 yearly, and those below age 90 complete the form every other year. The respondents are World War II veterans who reside outside the United States receiving SVB.

3. Use of Information Technology to Collect the Information

SSA did not create an electronic version of Form SSA-2010 under the agency's Government Paperwork Elimination Act (GPEA) plan because only 1,308 respondents complete the form. This is less than the GPEA cut-off of 50,000. However, we do allow beneficiaries to furnish the information via face-to-face or telephone interview in either a field-office or U.S. embassy. When we send the notification of the benefit review along with the SSA-2010, we encourage those beneficiaries age 90 and above to have a face-to-face interview, and inform beneficiaries under age 90 of their option either to use the paper form or have a personal interview.

4. Why We Cannot Use Duplicate Information

The nature of the information we are collecting and the manner in which we are collecting 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

If SSA were to not collect this information or collect it less frequently, improper payments and overpayments could occur. There are no technical or legal obstacles that prevent SSA from contacting this population for entitlement information.

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

The 60-day advance Federal Register Notice published on April 9, 2013, at 78 FR 21181, and SSA received no public comments. The second Notice published on June 28, 2013, at 78 FR 39055. If we receive any comments in response to the second Notice, we will forward them to OMB. There have been no outside consultations with members of the public.

9. Payment or 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 1,308 respondents will use Form SSA- 2010 annually. The estimated average time is 20 minutes for a total of 436 hours. This figure represents burden hours, and we did not calculate a separate cost burden.

13. Annual Cost to the Respondents (Other)

This collection does not impose a known cost burden to the respondents.

14. Annual Cost To Federal Government

The annual cost to the Federal Government is approximately \$23,100. This estimate is a projection of the costs for printing and distributing the collection instrument.

15. Program Changes or Adjustments to the Information Collection Request

Due to the age-entitlement requirements, the number of eligible individuals and beneficiaries will continue to decrease. We expect annual decreases of the use of this form as a result.

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. Exceptions 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 will not use statistical methods for this information collection.