

**Justification for Non-Substantive Changes for
Certificate of Coverage
CFR Citations
OMB No. 0960-0554**

Revisions to the Collection

- **Change #1:** Due to the new agreement between the United States and Hungary, SSA requests to include the Hungarian Certificate of Coverage Request form under OMB 0960-0554.

Justification #1: Section 233 of the *Social Security Act (Act)* authorizes the President to enter into bilateral social security agreements with countries for the purpose of coordinating the social security systems of the two countries. The United States signed an agreement with Hungary on February 3, 2015. *Section 233(c)(1)(B)* of the *Act* and *20 CFR 404.1913* of the *Code of Federal Regulations* state that these agreements eliminate dual coverage and taxation (a situation that occurs when a worker from one country works in another country and would otherwise be subject to social security coverage and taxation by both countries for the same work). Each agreement provides that upon the request of the worker or the employer, the country's system under which the period of work is covered will issue a certificate of coverage. This certificate serves as proof of exemption from coverage and taxation under the system of the other country. Because of the new agreement with Hungary, SSA created the Hungarian certificate of coverage form that requires respondents to provide personally identifiable information about the worker and the employer, and residential locations for the worker and employer.

- **Change #2:** SSA will also include the Hungarian Informational Pamphlet under OMB 0960-0554.

Justification #2: We provide pamphlets that instruct workers and or employers to write SSA and provide the specific required information to apply for a certificate in the country they wish to work. SSA uses the information to determine if the worker should be subject to U.S. Social Security coverage and taxation in accordance with the provisions of the agreement. Because of the new agreement, we will have a pamphlet that provides specific information relating to the U.S. – Hungary agreement.

We were unable to make these changes prior to the previous submission of the clearance package because SSA finalized the agreement after we submitted the clearance package. We are making these new changes now instead of waiting until the collection is up for renewal of OMB approval because we will begin to use these collections prior to the expiration date of our current OMB collection burden report of 10/31/2016. The expected entry into force date for the U.S. – Hungary agreement is early 2016. If we are unable to obtain approval for these collections by the entry into force date, the United States will be in violation of the agreement.

Revisions to the Burden

Due to the additional Certificate of Coverage under the new agreement with Hungary, we expect a marginal increase in the burden hours for this new collection. We estimate that our respondents will increase to 81,900 with an estimated burden increase to 54,833. The following burden chart shows the breakdown of the new respondents by category (Individuals responding via letter or Internet; Employers responding via letter or Internet):

Modality of Completion	Number of Respondents	Frequency of Response	Average Burden Per Response (minutes)	Estimated Total Annual Burden (hours)
Requests via Letter – Individuals (minus Denmark, Netherlands, Norway, & Sweden)	6,272	1	40	4,181
Requests via Internet – Individuals (minus Denmark, Netherlands, Norway, & Sweden)	9,407	1	40	6,271
Requests via Letter – Individuals in Denmark, Netherlands, Norway, & Sweden	280	1	44	205
Requests via Internet – Individuals in Denmark, Netherlands, Norway, & Sweden	421	1	44	309
Requests via Letter – Employers (minus Denmark, Netherlands,	25,087	1	40	16,725

Norway, & Sweden)				
Requests via Internet – Employers (minus Denmark, Netherlands, Norway, & Sweden)	37,632	1	40	25,088
Requests via Letter – Employers in Denmark, Netherlands, Norway, & Sweden	1,121	1	44	822
Requests via Internet – Employers in Denmark, Netherlands, Norway, & Sweden	1,680	1	44	1,232
Totals	81,900			54,833