

**Justification for Non-Substantive Changes for Form SSA-21 and MCS Macros
Supplement to Claim of Person Outside the United States
20 CFR 422.505(b), 20 CFR 404.460, 20 CFR 404.463, 42 CFR 407.27(c)
OMB No. 0960-0051**

Background

The Social Security Administration (SSA) uses Form SSA-21 to collect information to determine eligibility (or continued eligibility) for payment and taxation of social security benefits to which a non-U.S. citizen person is entitled, if that person has left the United States. Currently, the respondent can complete Form SSA-21 and mail it back to SSA, or an SSA employee can fill out the form over the phone or through a face-to-face interview. At this time, claimants must print the blank PDF and fill it out using a pen, or they need to use a typewriter to complete the form. As some handwriting is difficult to read, or illegible, these non-fillable versions of the form are inefficient and ineffective since SSA employees who cannot read the submitted form must re-contact the respondent prior to processing. In addition, the use of typewriters decreased significantly, as other tools, such as personal computing devices, increase in use.

SSA developed a fillable, printable version of the SSA-21, as some individuals may find it easier to use. The fillable version allows the respondents to complete the form electronically using a personal computer, or other computing device, print the completed form, and submit it to SSA. We developed this fillable version, as we want to ensure SSA provides effective communication and remains in compliance with the requirements of 45 CFR 85.51 of the *Code of Federal Regulations* and section 504 of the *Rehabilitation Act of 1973*. We propose the fillable PDF version as a more accessible modality. In addition, the new fillable modality will enhance our electronic services and recordkeeping efforts.

Revision to the SSA-21:

- **Change #1:** SSA intends to provide Form SSA-21 in a fillable PDF file on our website, in place of the non-fillable PDF version we currently provide. We propose to make all form entries fillable.

Justification #1: This change will allow the respondents to continue to print and complete the form by hand, or, alternatively, complete the form using a computing device, such as a personal computer or handheld (mobile) device, print, and submit the form to SSA for processing.

Revisions to the MCS Macros:

- **Change #1:** We un-bolded the text of questions 1, 2, and 3, and the parenthesis in questions 2 and 3. We bolded all prompt for responses (such as “**If NO:** go to #3” and “**Y/N**”).

Justification #1: We made these changes to make it easier to identify where

responses are necessary.

- **Change #2:** We used parenthesis () around question numbers (1), (2), and (3); and started each question on a new line.

Justification #2: We needed to make the questions easier to identify and stand out better.

- **Change #3:** We eliminated the blank line for responses (___Y___N) and left space instead (Y/N:). Added space for explanation of why claimants consider themselves a permanent resident in question 2.

Justification #3: We learned that it is easier for users to fill in a response into a blank space than to choose the correct answer by eliminating the other option. We also want to provide more room for an explanation.

- **Change #4:** We eliminated the plus (+) character and added explanations, such as “If Yes” and “If no”.

Justification #4: The “+” character did not test well for propagation to the MCS program and printing.

- **Change #5:** We eliminated the request for dates of residency in question 3.

Justification #5: We determined that we do not need to request this information, and by taking it off, we create more space to work with.

SSA will implement the changes to the SSA-21 and MCS Macros upon OMB approval.

This action does not affect the public reporting burden.