

Supporting Statement for Form SSA-2528-IT
Application for Benefits Under the Italy-U.S. International Social Security Agreement
20 CFR 404.1925
OMB No. 0960-0445

A. Justification

1. Introduction/Authoring Laws and Regulations

Section 233(a) of the *Social Security Act (Act)* authorizes the President of the United States to enter into international Social Security agreements between the United States (U.S.) 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 collect this information from individuals residing in Italy 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-IT. SSA uses Form SSA-2528-IT 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-IT 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 this form under the agency's Government Paperwork Elimination Act (GPEA) plan due to the low volume of usage, and because claimants only use this form outside the United States. 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 collect and the manner in which we collect it preclude duplication. While SSA uses the SSA-2490-BK (OMB # 0960-0448) to collect similar information from residents of other countries under similar Social Security agreements;

the SSA-2528-IT is used only for the unique agreement we have with the Italian Social Security agency. Since our agreement with Italy requires us to use this form, we cannot use the SSA-2490-BK for this purpose. Therefore, we are not duplicating information.

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 Italian resident'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

The 60-day advance Federal Register Notice published on May 22, 2019, at 84 FR 23623, and we received no public comments. The 30-day FRN published on August 1, 2019 at 84 FR 37704. If we receive any comments in response to this Notice, we will forward them to OMB.

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:

Modality of Completion	Number of Respondents	Frequency of Response	Average Burden Per Response (minutes)	Estimated Total Annual Burden (hours)
SSA-2528	300	1	20	100

The total estimated annual burden for this collection is **100** hours. We based this figure on current management information data, and it represents burden hours. 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 accounts for costs from the following areas: (1) designing, printing, and distributing the form; and (2) SSA employee (e.g., field office, 800 number, DDS staff) information collection and processing time.

15. Program Changes or Adjustments to the Information Collection Request

There are no changes to the public reporting burden.

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.