

**Supporting Statement for
Certificate of Coverage Request
20 CFR 404.1913
OMB No. 0960-0554**

A. Justification

1. Introduction/Authoring Law and Regulations

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 currently has agreements with 30 countries. Section 233(c)(1)(B) of the *Act* and 20 *CFR 404.1913* of the *Code of Federal Regulations* state that these agreements eliminate double coverage and taxation (a situation that occurs when a worker from one country works in the other country and would otherwise be subject to social security coverage and taxation by both countries for the same work). Each agreement contains rules for determining which country's laws will cover the period of work, and to which system the worker will pay taxes. 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. The certificate serves as proof of exemption from coverage and taxation under the system of the other country.

2. Description of Collection

To obtain a certificate, SSA requires the worker or employer to write to SSA and provide personally identifiable information and details of employment. The information required to issue a certificate differs depending on the agreement negotiated with a particular country. As a result, SSA created 30 forms for each agreement corresponding to the 30 countries with which we have agreements. The forms require respondents to provide personally identifiable information about the worker; the employer; and residential locations for the worker and employer. Some of the questions include the applicant's name; U.S. Social Security number; date of birth; country of birth; country of citizenship; country of permanent residence; date of hire; country of hire; beginning and ending date of work assignment in the foreign country; the employer; and residential location in the U.S. and abroad.

The 30 forms generally require similar information throughout, with a few exceptions. For Denmark, Iceland, Netherlands, Norway, and Sweden, we require information regarding the worker's family members in addition to the regular questions we ask on the forms for the other 25 countries. Our agreements with these five countries require us to include additional questions regarding the immediate workers' family names; their dates of birth; workers' and families' foreign social insurance numbers; as well as the workers' maiden names. In addition, our agreement with Poland requires us to include the worker's Polish Identification Number; and the agreement with Uruguay requires us to obtain an

email address for the worker.

We also provide pamphlets instructing workers or employers to write to 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. The respondents are U.S. citizens and residents who wish to work in a foreign country, and their employers.

3. Use of Information Technology to collect the Information

SSA provides electronic pamphlets, including detailed instructions to request a certificate in writing. We provide the same information on the 30 online forms available on our website. In addition, we provide our Internet web address for individuals to complete an electronic form and submit the required information. For example, pages 4-10 of the pamphlet for the U.S.-Australian agreement, list the information required to request a certificate. While we receive most certificate requests through the Internet, we also receive requests by mail and fax. The certificate request forms are available solely on the Internet, and we advertise them in the pamphlets. We do not include the forms in pamphlets. We do not have paper versions of the certificate forms, nor do we provide an option for individuals to print web forms to mail to us. Instead, we require respondents to complete and submit the electronic forms through our website. As of November 2018, 100% of respondents use the electronic forms available on our website.

4. Why We Cannot Use Duplicate Information

The nature of the information we collect and the manner in which we collect it precludes duplication. SSA does not use another collection instrument to obtain similar data.

5. Minimizing Burden on Small Respondents

This collection does not significantly affect small businesses or other small entities.

6. Consequence of Not Collecting Information or Collecting it Less Frequently

If we did not collect the information, SSA would be unable to determine whether U.S. workers abroad should be subject to U.S. Social Security law or foreign law under the applicable agreement. In addition, SSA would be unable to issue certificates to exempt workers from foreign social security taxes. Because we only collect the information once per respondent, we cannot collect it less frequently. There are no technical or legal obstacles that prevent 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 July 3, 2019, at 84 FR 31972, and we received no public comments. The 30-day FRN published on September 16, 2019 at 84 FR 48694. If we receive any comments in response to this Notice, we will forward them to OMB.

9. Payment or Gifts to Respondents

SSA does not provide payments or gifts to respondents.

10. Assurances of Confidentiality

SSA protects and holds confidential the information it collects 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

Modality of Completion	Number of Respondents	Frequency of Response	Average Burden per Response (minutes)	Estimated Total Annual Burden (hours)	Average Theoretical Hourly Cost Amount (dollars)*	Total Annual Opportunity Cost (dollars)**
Requests via Letter – Individuals (minus Denmark, Netherlands, Norway, Poland & Sweden)	5,833	1	40	3,889	\$22.50*	\$87,503**
Requests via Internet – Individuals (minus Denmark, Netherlands, Norway, Poland & Sweden)	9,761	1	40	6,507	\$22.50*	\$146,408**
Requests via	284	1	44	208	\$22.50*	\$4,680**

Letter – Individuals in Denmark, Netherlands, Norway, & Sweden						
Requests via Letter – Individuals in Poland	16	1	41	11	\$22.50*	\$248**
Requests via Internet – Individuals in Denmark, Netherlands, Norway, & Sweden	427	1	44	313	\$22.50*	\$7,043**
Requests via Internet – Individuals in Poland	25	1	41	17	\$22.50*	\$383**
Requests via Letter – Employers (minus Denmark, Netherlands, Norway, Poland & Sweden)	26,047	1	40	17,365	\$22.50*	\$390,713**
Requests via Internet – Employers (minus Denmark, Netherlands, Norway, Poland, & Sweden)	39,096	1	40	26,064	\$22.50*	\$586,440**
Requests via	1,137	1	44	834	\$22.50*	\$18,765**

Letter – Employers in Denmark, Netherlands, Norway, & Sweden						
Requests via Letter – Employers in Poland	57	1	41	39	\$22.50*	\$878**
Requests via Internet – Employers in Denmark, Netherlands, Norway, & Sweden	1,704	1	44	1,250	\$22.50*	\$28,125**
Requests via Internet – Employers in Poland	86	1	41	59	\$22.50*	\$1,328**
Totals	84,473			56,556		\$1,272,514**

* We based this figure on average U.S. citizen’s hourly salary, as reported by Bureau of Labor Statistics data.

** This figure does not represent actual costs that SSA is imposing on recipients of Social Security payments to complete this application; rather, these are theoretical opportunity costs for the additional time respondents will spend to complete the application. **There is no actual charge to respondents to complete the application.**

The total burden for this ICR is **56,556** burden hours (reflecting SSA management information data), which results in an associated theoretical (not actual) opportunity cost financial burden of **\$1,272,514**. SSA does not charge respondents to complete our applications.

13. Annual Cost to the Respondents (Other)

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

14. Annual Cost to the Federal Government

The annual cost to the Federal Government is approximately \$93,737. This estimate accounts for costs from the following areas: (1) designing, printing, and

distributing the form; (2) SSA employee (e.g., field office, 800 number, DDS staff) information collection and processing time; and (3) systems development, updating, and maintenance costs.

15. Program Changes or Adjustments to the Information Collection Request

When we last cleared this IC in 2018, the burden was 56,949 hours. However, we are currently reporting a burden of 56,556 hours. This change stems a decrease in the number of responses from 85,068 to 84,473. There is no change to the burden time per response. Although, the number of responses changed, SSA did not take any actions to cause this change.

16. Plans for Publication Information Collection Results

SSA will not publish the results of the information collection.

17. Displaying the OMB Approval Expiration Date

For the Internet versions of the booklets and online forms, SSA will insert expiration dates upon OMB approval.

For the paper versions of the booklets, OMB granted SSA an exemption from the requirement to print the OMB expiration date on its program forms and pamphlets. SSA produces millions of public-use forms and pamphlets with life cycles exceeding those of an OMB approval. Since SSA does not periodically revise and reprint its public-use forms and pamphlets (e.g., on an annual basis), OMB granted this exemption so SSA would not have to destroy stocks of otherwise useable forms and pamphlets 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 does not use statistical methods for this information collection.