

Supporting Statement for 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 (SVB) to certain World War II veterans who reside outside of the United States. SSA has the authority under the *Code of Federal Regulations, 20 CFR 408.714*, to request information from a beneficiary receiving Social Security benefits under the SVB program. We contact the beneficiaries by mail for their benefit review, and have them complete Form SSA-2010, Statement for Determining Continuing Entitlement for Special Veterans Benefits. Completion of this form helps us to maintain the integrity of the SVB program to determine continuing entitlement and the correct payment amount.

2. Description of Collection

SSA regularly reviews individuals' claims for SVB to determine their continued eligibility and the correct payment amounts. Individuals living outside of the United States who receive SVB must report to SSA any changes that may affect their benefits. SSA uses Form SSA-2010 to collect this required information from beneficiaries living outside the United States who are collecting SVB. Beneficiaries under age 90 receive notification of their benefit review along with the form every two years and beneficiaries age 90 or older have face-face interviews with the Foreign Service Post every year who assist them in completing this form. The respondents are SVB recipients.

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. In addition, because the population who can receive SVB is a dying population, we expect the respondent pool to continue to decrease over the next several years.

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 SSA did not use Form SSA-2010, improper payments and overpayments could

occur. Because we only collect the information once, we cannot collect 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 June 4, 2019, at 84 FR 25891, and we received no public comments. The 30-day FRN published on August 7, 2019 at 84 FR 38714. 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 the 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

We expect approximately 382 respondents will take about 20 minutes to complete this form annually for a total of 127 burden hours:

Modality of Completion	Number of Respondents	Frequency of Response	Average Burden Per Response (minutes)	Estimated Total Annual Burden (hours)
SSA-2010	382	1	20	127

The total estimated annual burden for this collection is **127** 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 the Respondents (Other)

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 \$4,154. 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

When we last cleared this IC in 2016, the burden was 600 hours. However, we are currently reporting a burden of 127 hours. This change stems from a decrease in the number of responses from 1,799 to 382. As we mentioned in #3 above, as the respondent pool is a dying population, we expect we expect the respondent pool to continue to decrease over the next several years. 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

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 does not use statistical methods for this information collection.