

**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 and 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 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**

When a resident of Italy decides or expresses intent to claim benefits from the United States, the Italian Social Security agency triggers collection of this information. As per the November 1, 1978 totalization 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 the factors of eligibility to U.S. benefits, such as age, relationship, citizenship, marriage, death, military service, or to evaluate a family bible or other family record. 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**

The SSA-2528-IT is currently available as a fillable printable PDF. This collection does not currently have a fully public-facing Internet version, as we prioritized other information collections for full electronic conversions. Given that IT Mod programming is an ongoing, dynamic project, we cannot provide specific timelines for when we will be able to make any particular ICR available

via Internet web-based application. We will ultimately convert most existing ICRs to full electronic versions depending on how they fall within our overall IT Mod schema, but this may be unconnected to the PRA approval lifecycle.

In the interim, we evaluated this collection for conversion to a submittable PDF. Given the high volume of conversions we are coordinating and the more urgent nature of some of the other conversions, we ultimately decided not to prioritize this ICR for conversion to fully submittable PDF at this time. When we are able to schedule this form for conversion to a submittable PDF, we will submit a Change Request to OMB to request prior approval.

**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 No. 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**

If we did not use Form SSA-2528-IT, applicants would be unable to file a claim for U.S. Social Security benefits directly with an agency in Italy. SSA only collects the information based upon an Italian resident's need to apply for U.S. Social Security benefits. Because we collect this information on an as needed basis, 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 30, 2022, at 87 FR 39153, and we received no public comments. The 30-day FRN published on September 20, 2022 at 87 FR 57551. 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**

Please see the burden chart below:

<b>Modality of Completion</b>	<b>Number of Respondents</b>	<b>Frequency of Response</b>	<b>Average Burden Per Response (minutes)</b>	<b>Estimated Total Annual Burden (hours)</b>	<b>Average Theoretical Hourly Cost Amount (dollars)*</b>	<b>Total Annual Opportunity Cost (dollars) **</b>
SSA-2528-IT	462	1	20	154	\$28.01*	\$4,314**

\* We based this figure on the average U.S. worker’s hourly wages, as reported by Bureau of Labor Statistics data ([https://www.bls.gov/oes/current/oes\\_nat.htm](https://www.bls.gov/oes/current/oes_nat.htm)).

\*\* 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.**

We base our burden estimates on current management information data, which includes data from actual interviews, as well as from years of conducting this information collection. Per our management information data, we believe that 20 minutes accurately shows the average burden per response for reading the instructions, gathering the facts, and answering the questions. Based on our current management information data, the current burden information we provided is accurate. The total burden for this collection instrument is 154 burden hours (reflecting SSA management information data), which results in an associated theoretical (not actual) opportunity cost financial burden of \$4,314. SSA does not charge respondents to complete our applications.

**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 \$5,203. This estimate accounts for costs from the following areas:

<b>Description of Cost Factor</b>	<b>Methodology for Estimating Cost</b>	<b>Cost in Dollars*</b>
Designing and Printing the Form	Design Cost + Printing Cost	\$0*
Distributing, Shipping, and	Distribution + Shipping + Material	\$0*

Material Costs for the Form	Cost	
SSA Employee (e.g., field office, 800 number, DDS staff) Information Collection and Processing Time	GS-9 employee x # of responses x processing time	\$4,200
Full-Time Equivalent Costs	Out of pocket costs + Other expenses for providing this service	\$0*
Systems Development, Updating, and Maintenance	GS-9 employee x man hours for development, updating, maintenance	\$1,003
Quantifiable IT Costs	Any additional IT costs	\$0*
<b>Total</b>		<b>\$5,203</b>

\* We have inserted a \$0 amount for cost factors that do not apply to this collection.

SSA is unable to break down the costs to the Federal government further than we already have. It is difficult for us to break down the cost for processing a single form, as field office staff often help respondents fill out several forms at once, and the time it takes to do so can vary greatly per respondent. As well, because so many employees have a hand in each aspect of our forms, we use an estimated average hourly wage, based on the wage of our average field office employee (GS-9) for these calculations. However, we have calculated these costs as accurately as possible based on the information we collect for creating, updating, and maintaining these information collections.

**15. Program Changes or Adjustments to the Information Collection Request**

When we last cleared this IC in 2019, the burden was 100 hours. However, we are currently reporting a burden of 154 hours. This change stems from an increase in the number of responses from 300 to 462. 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. These figures represent current Management Information data.

**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.