Justification for Non-Substantive Changes to
Certificate of Coverage
CFR Citations
OMB No. 0960-0554

<u>Resubmission of the Collection within One Year of OMB Approval</u>

<u>Change #1</u>: SSA is modifying our 30 Totalization informational brochures from a .PDF format to an online unified website. Information on how to request a Certificate of Coverage (COC) is included in each partner country's Totalization informational brochure. The currently published brochures will be updated and transitioned to our unified website.

<u>Justification #1</u>: SSA is making this change due to OMB's Terms of Clearance. OMB suggested that the collection instrument access for requesting a certificate of coverage (COC) should be prominently displayed by a button rather than a hyperlink (remove the hyperlink to the Online Processing Tracking System (OPTS) - allowing easy access for individuals to electronically request a COC before other submission modalities (such as mail or fax). We have incorporated this change in our revised partner country Totalization informational unified website. (See the attached screen shots)

<u>Change #2</u>: SSA is also modifying the public facing OPTS website so the hyperlink for accessing the COC collection form is displayed as a button located at the top of the webpage, and is labeled Certificate of Coverage. (See the attached screen shots of the original and modified websites.)

<u>Justification #2</u>: We are making this change, because OMB suggested SSA incorporate the modification in change #2. Individuals will no longer have to scroll through actionable information on this website, and COC buttons are now located in two conspicuous locations toward the top of the webpage. We are also adding a new section named, "Accessing the online certificate request forms."

SSA is resubmitting the non-substantive change request within One Year of OMB approval based on OMB's Terms of clearance when approved on 2/13/23:

We will implement these changes upon OMB approval.

These actions do not affect the public reporting burden.