

**Supporting Statement for Form 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. Additionally, Sections 808 and 810 of the *Act* allows us to collect this information. 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 confirm individuals continue eligibility and correct payment amounts. SSA requires individuals living outside the United States receiving SVB to report any changes to SSA that may affect their benefits. These include changes such as: (1) a change in mailing address or residence; (2) an increase or decrease in a pension, annuity, or other recurring benefit; (3) a return or visit to the United States for a calendar month or longer; or (4) an inability to manage benefits. All SVB beneficiaries have interviews with the Federal Benefits Unit (FBU) every year, who assist them in completing form SSA-2010, however; due to the age of the recipient's majority of a FBU field representative personally visits the SVB recipient and assists the recipient with the completion of Form SSA-2010. The FBU calls the recipient and sets up a time to conduct the face-to-face interview at the recipient's residence. If SSA does not have a field representative in the area, SSA sends the recipient a letter requesting the recipient to complete the enclosed SSA-2010 with a return envelope; and to provide SSA with the following documents:

- (1) ID
- (2) Barangay certificate showing residency of that village.
- (3) Photo holding a current newspaper.

If the beneficiary fails to attend the interview, SSA suspends their benefits. SSA will continue to collect and use form SSA-2010 until there are no more SVB beneficiaries.

- **Psychological Costs**
  - o **Psychological Cost #1:**

- **Requirement for Program:** Form SSA-2010 requests information from the respondent that SSA may already have on file as part of our continuing reviews.
  - **Psychological Cost:** The respondent may perceive this as the agency's distrust of SVB recipients, as they may feel SSA should not need to ask for information we already have on file. This may cause the respondents to delay their completion of form SSA-2010, due to the request of the same information and the travel to the FBU. However, SSA requires full completion of the SSA-210 to continue to receive benefits.
- o **Psychological Cost #2:**
- **Requirement for Program:** For a very small number of respondents who live too far away from an FBU, the respondent may find it burdensome to collect the necessary documentation to mail to the FBU with the form.
  - **Psychological Cost:** For those respondents who need to mail back the form, this burdensome request may delay their submission as they need to collect this information.

Note: This is an extremely rare occurrence. For most respondents, the FBU technician travels to them after setting up the interview appointment. Most respondents do not need to mail the form.

We understand these psychological costs may cause respondents to delay their completion of the information collection or cause them to abandon the information collection entirely. However, we require full completion of this collection to continue to receive benefits. Therefore, we have taken this potential psychological cost into account when calculating our burden in #12 below.

The respondents are SVB beneficiaries living outside the United States.

### 3. **Use of Information Technology to Collect the Information**

Form SSA-2010 is available as a fillable printable PDF on SSA's website for respondents to download, complete, print, and submit to SSA. The FBU assists beneficiaries in completing the form during face-to-face interviews. The FBU enters the information from the form into the Consolidated Claims Experience system. As of FY 2024, this form does not have a signature requirement. If the FBU cannot conduct a face-to-face interview, SSA mails the form to the respondent, along with an envelope to mail it back to SSA. SSA does not plan to make a fully electronic version of this information collection because the FBU assists with the completion of every form due to the age of the respondents. In addition, because all remaining SVB beneficiaries are now in their mid to late

90's, the respondent pool will continue to decrease over the next several years until there are no longer any respondents. Therefore, the costs of making a fully electronic version of the form far outweigh the benefits at this time.

**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 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-2010, we would have no means to maintain the integrity of the SVB program to determine continuing entitlement and correct payment amounts for the recipients, which could result in improper payments and overpayments. Because we only collect the information as needed, 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 July 21, 2025, at 90 FR 34327, and we received no public comments. The 30-day FRN published on December 17, 2025, at 90 FR 58678. If we receive any comments in response to this Notice, we will forward them to OMB. We did not consult with the public in the revision of this form.

**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

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)***
SSA-2010	27	1	20	9	\$32.66*	\$294***

\* We based this figure on the average U.S. worker's hourly wages, as reported by Bureau of Labor Statistics data ([Occupational Employment and Wage Statistics](#)).

\*\*\* 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.**

**Note:** We did not calculate a travel time estimate for this information collection, as most often, the FBU technicians conduct these interviews at the residence of the SVB recipient. It is very rare for the FBU to require respondents to travel to the FBU for the interview. In addition, as the FBU calls the respondents, sets up appointments for these interviews, and then goes to the respondents to conduct the interviews at the set times, we did not record a wait time for this ICR.

We calculated the following Learning Cost time burden based on the estimated time and effort we expect respondents will take to learn about this program, its applicability to their circumstances, and to cover any additional research we believe respondents may need to take to understand how to comply with the program requirements (beyond reading the instructions on the collection instrument):

Total Number of Respondents	Frequency of Response	Estimate Learning Cost (minutes)	Estimated Total Annual Burden (hours)	Total Annual Learning Cost (dollars)**
30	1	30	15	\$490****

\*\*\*\*We based this dollar amount on the Average Theoretical Hourly Cost Amount in dollars shown on the burden chart above.

NOTE: We included the total opportunity cost estimate from this chart in our calculations when showing the total time and opportunity cost estimates in the paragraph below.

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 learning about the program; receiving notices as needed; reading and understanding instructions; gathering the data and documents needed; answering the questions and completing the information collection instrument; scheduling any necessary appointment or required phone call; consulting with any third parties (as needed); and waiting to speak with SSA employees (as needed). Based on our current management information data, the current burden information we provided is accurate. The total burden for this ICR is **9** burden hours (reflecting SSA management information data), which results in an associated theoretical (not actual) opportunity cost financial burden of **\$784**. 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 on the respondents.

**14. Annual Cost To Federal Government**

The annual cost to the Federal Government is approximately **\$3,844**. 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	\$55
Distributing, Shipping, and Material Costs for the Form	Distribution + Shipping + Material Cost	\$0*
SSA Employee (e.g., field office, 800 number, DDS staff) Information Collection and Processing Time	GS-9 employee x # of responses x processing time	\$369
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	\$3,420

Quantifiable IT Costs	Any additional IT costs	\$0*
<b>Total</b>		<b>\$3,844</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 2023, the burden was 28 hours. However, we are currently reporting a burden of 9 hours. This change stems from a decrease in the number of responses from 85 to 27. As we mentioned in #3 above, the respondents are World War II veterans aged 95+, so the respondent pool will 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. These figures represent current Management Information data.

**Note:** The total burden reflected in ROCIS is **23**, while the burden cited in #12 of the Supporting Statement is **9**. This discrepancy is because the ROCIS burden reflects the learning costs.

**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.