

Justification for Non-Substantive Changes for SSA-2490-BK
Application for Benefits Under A U.S. International Social Security Agreement
CFR Citations
OMB No. 0960-0448

Background

SSA collects this information using Form SSA-2490-BK to determine entitlement to Social Security benefits from the United States or from a country that enters into a Totalization agreement with the United States. The United States signs new agreements whenever necessary, and we may create Totalization agreements with several new countries in any given year, and we update this information collection accordingly.

Revisions to the Collection

- **Change #1:** Due to the new agreements the United States signed with Romania, we are adding Romania under OMB. 0960-0448.

Justification #1: Section 233 of the *Social Security Act (Act)* authorizes the President to enter into bilateral social security agreements between the United States and foreign countries. Under such agreements, called Totalization agreements, SSA may base retirement, survivors, disability, and derivative benefits on combined periods of coverage from the two countries. The United States signed an agreement with Romania on March 23, 2023. 20 CFR 404.1925 of the *Code of Federal Regulations* provides that if an applicant files for benefits from one country, that application can constitute an application for benefits from the other country, provided the applicant express the intent to claim benefits from the other country. To assist the other country in determining the right to benefits under its laws, or in identifying coverage under its social insurance system, each country obtains certain information from the applicant and exchanges that information with the other country. The United States uses Form SSA-2490-BK to obtain information needed to process claims for U.S. benefits under the existing and any future Social Security agreements. We are including include Romania under OMB 0960-0448 so SSA field office personnel can collect the required information from individuals applying for benefits under the U.S.-Romania agreement. The entry into force date for the U.S.- Romania agreement is September 1, 2026.

Revisions to the Burden

We anticipate a slight increase in the total burden hours for this new collection, as we estimate that the number of respondents will initially increase by 100; 50 for each category.

Method of Completion	Number of Respondents	Frequency of Response	Average Burden Per Response (minutes)	Estimated Total Annual Burden (hours)	Average Theoretical Hourly Cost Amount (dollars)*	Average Wait Time in Field Office or Teleservice Centers (minutes) **	Total Annual Opportunity Cost (dollars)***

SSA-2490-BK (MCS)	16,245	1	24	6,498	\$14.27*	35**	\$227,949***
SSA-2490-BK (paper)	2,170	1	24	868	\$14.27*	35**	\$30,452***
Totals	18,415			7,366			258,401***

**We based this figure on the average combined FY 2026 wait times for field offices (22 minutes) and for teleservice centers (48 minutes which includes the average speed of answer of 7 minutes as well as the average 41-minute wait time for a call back from an SSA technician), based on SSA's current management information data. This figure reflects both data from our systems and the data posted on our public facing website ([Social Security performance | SSA](#)) on the date we drafted this document. As the figures fluctuate daily, the wait times may be different on the website than they appear here. We continue to monitor our website and management information data on call back times to ensure we report updated figures when possible.

*** 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 applicatio**