

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/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 to apply for, or indicates an intent to claim, benefits from the United States, the Italian Social Security agency initiates the collection of relevant information. Under the totalization agreement between the United States and Italy, effective November 1, 1978, the Italian Social Security agency requires residents of Italy who apply for U.S. Social Security benefits through the agency to complete Form SSA-2528-T. The Social Security Administration (SSA) uses this form to determine eligibility for U.S. benefits, including factors such as age, relationship, citizenship, marriage, death, military service, or to evaluate supporting documents like a family bible or other family records. Italian Social Security agencies assist applicants in completing Form SSA-2528-IT and then forward the completed form to SSA for processing.

We identified the following psychological costs based on the requirements for this information collection:

Psychological Cost:

- **Requirement for Program:** Residents of Italy are required to use the SSA-2528-IT form to apply for benefits from the United States under the totalization agreement between the United States and Italy, which took effect on November 1, 1978. The SSA-2528-T requests a significant amount of information regarding the claimant,

their dependents, and their work in Italy.

- **Psychological Cost:** Respondents may perceive the questions could negatively impact their eligibility to U.S. benefits or affect the time it will take them to receive benefits, which can cause them concern or stress.

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 for the residents of Italy to receive U.S. benefits. Therefore, we have taken this potential psychological cost into account when calculating our burden in #12 below.

The respondents are residents of Italy seeking 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.

Although we have other totalization agreement forms like the SSA-2490-BK (OMB Control No. 0960-0448) that allow for electronic submission and do not require a wet signature, the SSA-2528-IT is distinct in several important ways: (1) we use this form exclusively in Italian local and provincial INPS (Italian social Security) offices, (2) we provide it in Italian for residents of Italy, and (3) it must comply with the specific requirements of the U.S.-Italy totalization agreement. Both countries have agreed to the use of this specific form and its associated procedures. While digital signatures are technically possible, Italian offices strongly prefer traditional paper forms with handwritten, wet-ink signatures, and, therefore, we agreed to a wet signature in our totalization agreement with Italy. Additionally, due to the relatively low volume of submissions (approximately 400 per year) we have not prioritized the development of an electronic submission process for the SSA-2528-IT, or requested a change to our agreement with Italy to allow for one.

Therefore, due to the issues mentioned above, we ultimately decided not to prioritize this ICR for conversion to fully submittable PDF at this time. When we are able to negotiate with Italy to schedule this form for conversion to a submittable and electronically signable PDF format, we will submit a Change Request to OMB to request prior approval.

4. **Why We Cannot Use Duplicate Information**

The specific information we collect and the methods we use to collect it prevent any

duplication. Although SSA uses Form SSA-2490-BK (OMB No. 0960-0448) to gather similar information from residents of other countries under comparable Social Security agreements, Form SSA-2528-IT is designated exclusively for our unique agreement with the Italian Social Security agency. Because our agreement with Italy requires the use of this specific form, we cannot substitute SSA-2490-BK for this purpose. As a result, we avoid any duplication of 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 26, 2026, at 91 FR 38753, and we received no public comments. The 30-day FRN published on August 27, 2026, at 91 FR 55418. 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 development 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

Please see the burden chart below:

Method of Completion	Number of Respondents	Frequency of Response	Average Burden Per Response (minutes)	Estimated Total Annual Burden (hours)	Average Theoretical Cost Amount (dollars)*	Total Annual Opportunity Cost (dollars) **
SSA-2528-IT	462	1	20	154	\$33.54*	\$5,165**

* We based this figure on the average U.S. worker's hourly wages, as reported by the 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.**

We did not include travel time as per our current management information data, respondents who complete the paper forms either return them to the Italian Social Security agencies by mail or schedule a telephone interview, during which the Italian Social Security agencies assist applicants in completing Form SSA-2528-IT and then forwards the completed form to SSA for processing. There is a possible indirect travel burden to applicants if they bring the completed form to the embassy office; however, we receive very few of the forms in this manner, and, therefore, did not include a travel burden for the applicants.

We did not include a separate Learning Cost for this information collection, as we include the Learning Cost in the burdens listed in the chart above.

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 **154** burden hours (reflecting SSA management information data), which results in an associated theoretical (not actual) opportunity cost financial burden of **\$5,165**. 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 **\$6,411**. This estimate accounts for costs from the following areas:

Description of Cost Factor	Methodology for Estimating Cost	Cost in Dollars*
Designing and Printing the Form	Design Cost + Printing Cost	\$0*
Distribution, 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	\$5,212
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	1,198
Quantifiable IT Costs	Any additional IT costs	\$0*
Total		\$6,411

* 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 technicians often help respondents fill out several forms at once, and the time it takes to do so can vary greatly per respondent. Also, 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

There are no changes to the public reporting burden.

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.