

Justification
Representative Payee Parental Custody Monitoring
RRB Form G-99d

1. Circumstances of information collection - Under Section 12(a) of the Railroad Retirement Act, the RRB is authorized to select, make payments to, and conduct transactions with, a beneficiary's relative or some other person willing to act on behalf of the beneficiary as a representative payee. The RRB is responsible for determining if direct payment to a beneficiary or payment to a representative payee would best serve the beneficiary's interest.

Inherent in the RRB's authorization to select a representative payee is the responsibility to monitor the payee to assure that the beneficiary's interests are protected. Currently, the RRB has three types of representative payees: (1) court appointed, (2) RRB appointed, and (3) parent-for-child. The RRB currently monitors one-third of payees in categories one and two every year so that each payee reports on a triennial basis (OMB Information collection 3220-0151, Representative Payee Monitoring). Court appointed payees are required to provide the RRB with a copy of the court accounting records; RRB appointed payees are required to provide the RRB with summarized accounting records.

All parent-for-child representative payees are monitored triennially. The purpose of this program is to verify that the parent still retains custody of the child. The last monitoring was conducted in September 2007.

The monitoring of representative payee accountability by the RRB is prescribed in 20 CFR 266.7.

2. Purposes of collecting/consequences of not collecting the information
– The form used by the RRB in conducting the parent-for child monitoring program is **Form G-99d, Parental Custody Report**. Form G-99d is the computer-generated form used by the RRB as the initial request for soliciting information from a parent-for-child payee. The form is released from RRB headquarters directly to the payee, along with an envelope for its return to the responsible RRB field office shown in the lower portion of the form.

The parent-for-child payee's name and address and other identifying information in the top portion of the form and the name and address of the responsible field office shown in the bottom portion of the form are computer printed before the form is released.

The RRB field office is responsible for controlling for the return of the completed Form G-99d within 30 days. If the initial Form G-99d is not returned within the 30 days, a follow-up Form G-99d printed "SECOND REQUEST" at the top of the form, is released by the field office. If the follow-up Form G-99d is not returned after 15 days, the field office will secure completion of Form G-99c, Representative Payee Evaluation Report, OMB No. 3220-0151. If the returned Form G-99d indicates that the parent no longer has custody of the child, the field office will initiate an investigation which could result in a suspension of benefit

payments, or the designation by the RRB of another representative payee in place of the parent.

The RRB proposes no changes to Form G-99d.

3. Planned use of improved information technology or technical/legal impediments to further burden reduction - None planned at this time. Not practicable as form is issued by RRB with pre-filled data.
4. Efforts to identify duplication - This information collection does not duplicate any other RRB information collection.
5. Small business respondents - N.A.
6. Consequences of less frequent collection - Each payee will report on a triennial basis. Less frequent reporting would not be advisable considering the circumstances.
7. Special Circumstances - None
8. Public comments/consultations outside the agency - In accordance with 5 CFR 1320.8(d), comments were invited from the public regarding the information collection. The notice to the public was published on page 61193 of the October 29, 2007 Federal Register. No requests for further information or comments were received.
9. Payments or Gifts to Respondents - None
10. Confidentiality - Privacy Act System of Records, RRB-22, Railroad Retirement, Survivor, and Pensioner Benefit System.
11. Sensitive questions - There are no questions of a sensitive nature.
12. Estimate of respondent burden - The current and proposed annual burden for this information collection is as follows.

Current Burden

Form #	Annual Responses	Time (Min)	Burden (Hrs)
G-99d	1,230	5	103
Total	1,230		103

Proposed Burden

Form #	Annual Responses	Time (Min)	Burden (Hrs)
G-99d	1,030	5	86
Total	1,030		86

	<u>Responses</u>	<u>Hours</u>		
Total burden change	-200	-17		
Adjustment			-200	-17

13. Estimate of annual cost to respondents or record keepers - N.A.
14. Estimated cost to Federal government - N.A.
15. Explanation for changes in burden - The burden has been reduced from 1,230 responses and 103 hours to 1,030 responses and 86 hours based on the actual amount of responses received during our latest monitoring effort in September of 2007. We have shown the reduction as an adjustment.
16. Time schedule for data collection and publication - The results of this collection will not be published.
17. Request to not display OMB expiration date - The G-99d is seldom revised. Given the costs associated with redrafting, reprinting and distributing the form in order to keep the appropriate OMB expiration date in place, the RRB requests authorization to not display the expiration date on the form.
18. Exceptions to Certification Statement - None