

Justification  
**Student Beneficiary Monitoring**  
RRB Forms G-315, G-315A and G-315A.1

I. Circumstances of information collection - Under the provisions of the Railroad Retirement Act (RRA), there are two types of benefits payments that are based upon the status of a child being in full-time elementary or secondary school attendance at age 18-19:

- a survivor child's annuity benefit under section 2(d)(2)(iii), and
- an increase in the employee retirement annuity under the Special Guaranty computation as prescribed in section 3(f)(3) and 20CFR 229.

The survivor student annuity is usually paid by direct deposit at a financial institution to the student's check or savings account or a joint bank account with the parent.

The requirements for eligibility as a student are prescribed in 20CFR 216.74, and include students in independent study or home schooling. The evidence to obtain benefits based on full-time elementary or high school attendance at an educational institution is prescribed in 20CFR 219.54 and 219.55.

In survivor cases, Form AA-19, Application for Child's Annuity (OMB No.3220-0030), is required if the student is age 18-19 at initial entitlement. When the child is under age 18 at initial entitlement, Form AA-19 is filed on behalf of the child, for a minor child's annuity, and protects the child's rights to student benefits at attainment of age 18, provided there is no break in entitlement between the month the child attains age 18 and the month the child becomes entitled as a full-time student. A new form AA-19 is not required at attainment of age 18.

2. Purposes of collecting the information - For the Railroad Retirement Board (RRB), to satisfy itself that a child is entitled to student benefits, the RRB requires evidence of full-time school attendance. Such evidence is to include a signed statement from the child that s(he) is attending full-time elementary or secondary school, and is not being paid by an employer to attend school, and either;

- a statement from the school registrar verifying that the child is attending school full-time, or
- when applicable, copies of the documentation approving the home schooling of the child at the elementary or secondary school level.

The forms used by the RRB to develop the evidence needed as proof of full-time elementary or secondary school attendance follow:

**RRB Form G-315, Student Questionnaire**, is used to obtain the information needed for full-time elementary or secondary school attendance (a) when the student is age 18-19 at initial entitlement to the survivor annuity, (b) when the child annuitant attains age

18 and qualifies as a full-time student, and (c) for student monitoring. For student monitoring, Form G-315 also obtains information on a student's marital status, social security benefits and employment. When the form is mailed by an RRB field office to the student or the representative payee, the identifying information requested on the accompanying Form RL-315, Cover Letter to Form G-315, and Section A, Items 1-3 of Form G-315 are both entered by the field office before the form is released. After completing the remainder of the G-315, the student or representative payee obtains school verification, in Section B, of the information provided on the form and returns the form to the RRB field office in the pre-addressed return envelope provided for such purpose.

Form G-315 is similar to page 2 of the Social Security Administration's (SSA) Form SSA-1372-BK, Student's Statement Regarding School Attendance. However, the RRB does not release Form G-315 to all children attaining age 18. The student must contact the RRB field office and request it.

When used for student monitoring, Form G-315 is similar to the SSA-1383, Student Reporting Form (OMB No. 0960-0088). Though SSA instructs the student to return the form only when there is a change to be reported and does not send out any additional monitoring forms during the school year, the RRB sends out the Form G-315 for survivor student monitoring in September, December, March, at the end of the school year, or if earlier, at attainment of age 19 and requires the student return all of the monitoring forms.

Information booklet G-316, *Railroad Retirement Benefits for Student(s) Age 18-19 and In Elementary or Secondary School*, is enclosed with Form G-315 at initial entitlement as a student. The booklet is also available at any RRB field office and at [www.rrb.gov](http://www.rrb.gov).

**The RRB proposes no changes to Form G-315.**

To our knowledge no other agency, other than the SSA, uses a form or forms similar to Form G-315.

**RRB Form G-315A, Statement of School Official**, is used to obtain verification from a school of a student's full-time attendance (FTA) when a student fails to return a monitoring Form G-315. The field office enters their facsimile number as well as the identifying information on the accompanying Form RL-315A, Cover Letter to Form G-315A, and Section A, Items 1-7 of Form G-315A, before the form is released. After the G-315A is complete, it along with the RL-315A, is returned to the field office either by facsimile or by mail in the envelope provided for that purpose. The RRB information

entered is based on the full-time attendance information provided by the student on a previous monitoring questionnaire.

Form G-315A is similar to Form SSA-1372BK, *Certification by School Official (OMB No. 0960-0105)*. To our knowledge, no other agency, other than SSA, uses a form similar to Form G-315a.

**The RRB proposes no changes to Form G-315A.**

**RRB Form G-315A.1, School Official's Notice of Cessation of Full-Time Attendance**, is released by the RRB field office to a student's school after the completed Form G-315 or

G-320 (OMB 3220-0083) is returned by the student. The field office enters their facsimile number as well as the identifying information on the accompanying form RL-315A.1, cover Letter to Form G-315A.1 before the form is released. The school retains Form G-315A.1 for future use in notifying the RRB when an event occurs that causes full-time attendance to end, which makes the student ineligible for future benefits based upon full-time school status. When/if Form G-315A.1 is returned, it can be mailed to the facsimile number provided or mailed.

**The RRB proposes no changes to Form G-315A.1.**

3. Planned use of improved information technology or technical/legal impediments to further burden reduction – Internet-based on-line completion is not cost-effective due to low-volume.
4. Efforts to identify duplication - This information collection does not duplicate any other information collection.
5. Small business respondents - N.A.
6. Consequences of less frequent collection - Forms G-315, G-315A and G-315A.1 provide current information about individuals receiving benefits under the RRA on the basis of full-time school attendance. Less than current information would adversely affect the RRB's determinations concerning a beneficiary's continued eligibility for benefits and could result in benefit overpayments by the RRB.
7. Special Circumstances - N.A.
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 22182 and 22183 of the April 24, 2008, Federal Register. No comments or requests for additional information were received.

- 9. Payments or gifts to respondents - None
- 10. Confidentiality - Privacy Act System of Records, RRB-22, Railroad Retirement, Survivor and Pension Benefit System.
- 11. Sensitive questions - N.A.
- 12. Estimate of Respondent burden -The current estimated annual burden for this collection remains unchanged and is as follows:

Current Burden

Form #	Annual Responses	Time (Min)	Burden Hours
G-315	860	15	215
G-315A	20	3	1
G-315A.1	20	2	1
Total	900		217

- 13. Estimate of annual cost to respondents or record keepers - N.A.
- 14. Estimate of cost to Federal government - N.A.
- 15. Explanation for changes in burden – N.A.
- 16. Time schedule for data collection and publication - The results of this collection will not be published.
- 17. Request not to display OMB expiration date - The forms associated with this collection are seldom revised. Given the costs associated with redrafting, reprinting, and distributing the forms in order to keep the appropriate OMB expiration date in place, the RRB requests the authority to not display the expiration date on the forms.
- 18. Exceptions to the Certification Statement - None