

## Justification

**Request for Internet Services**

## Request for Password Request code (PRC) and PIN/Password Establishment

1. Circumstances of information collection - The Government Paperwork Elimination Act (GPEA) required Federal agencies to provide its customers the option to submit information or to transact business with agencies electronically, when practical, as a substitute for paper. The Railroad Retirement Board (RRB) has a Personal Identification Number (PIN)/Password system that provides RRB customers with the ability to request a Password Request Code (PRC) and subsequently establish an individual PIN/Password which is the initial step to conducting transactions with the RRB on a routine basis through the Internet, as required by the GPEA. The RRB's authority to collect the information needed to set up the PIN/Password account is Section 7(b)(6) of the Railroad Retirement Act.

**\*Terms of Clearance:**

**Pursuant to OMB M-07-16, OMB approved this information collection for 18 months to allow (RRB) to gather information concerning the use and need of individual SSN's and asked RRB to provide a written explanation to a series of questions. The questions and RRB's response(s) follow.**

1. **Authority for collecting the SSN** – In meeting its primary mission for the payment of benefits under the Railroad Retirement Act (RRA) and the Railroad Unemployment Insurance Act (RUIA) the Railroad Retirement Board (RRB) collects personal identifying data elements, including name, social security number (SSN), and date of birth under the authority of Section 7(b)(6) of the RRA and Section 12(l) of the RUIA. Entitlement to and qualification of for such benefits are based on wage and compensation records, among other factors, which must be collected, maintained, stored and processed from employers and other Federal entities such as the Social Security Administration and the Internal Revenue Service.

As such, RRB must design systems that collect, maintain, store and utilize this data, which can only be identified by the applicant's SSN. Risks concerning re-disclosure and misuse of information associated with this information collection are mitigated accordingly.

2. **Explanation for the use of the SSN on the form** – Employer wage records are maintained by SSN. The use of the SSN is particularly critical in this application as it allows a respondent to apply for access to RRB Internet-based activity without first providing any proof of identity to RRB field office staff. The SSN is a critical piece of the RRB's process to initially verify the identify of an annuitant/claimant who wants to participate in RRB web-based activity.
3. **Alternative method(s) (other than the use of the SSN) for verifying the identity of an individual for the purposes of carrying out the information collection requirement** – None

**4. The cost and systems redesign that would be required to remove the use of the SSN and implement the alternate method(s) of verifying information. The analysis should estimate costs to the program each year over 5 years. -** Since the

RRB has not developed alternative methods for verifying an applicant's identity without the SSN at the present time, we have not developed a cost-benefit analysis for systems redesign.

However, the RRB is an active participating member (in-person and via teleconference) of an interagency committee of high volume PII users (SSN Best Practice Collaborative) who continue to identify, explore, and share alternative methods for the elimination/reduction of SSN use.

2. Purposes of collecting/consequences of not collecting the information – The Personal Identification Number (PIN)/Password system provides applicants and annuitants with the ability to conduct business with the RRB electronically. A portion of the system allows the RRB to collect and use information needed to establish a PRC with the RRB. Once a PRC is established, the RRB collects information from the user to establish a unique PIN/Password that allows access to RRB Internet-based Railroad Retirement Act and Railroad Unemployment Insurance Act applications and claims (Internet-based applications and claims are still largely under development). The information collected is used exclusively to verify the identity of the requestor.

**The following screens are used to collect the necessary information:**

\*Request for Password Request Code (railroad employee)

\*Request for Password Request Code (foreign version)

Establish PIN/Password (Establish Internet Account)

**\*Depending on the response to the question, "where does the employee live" the employee either receives a U.S version or foreign version. Both options are included in the Request a Password Request Code (current) and Request a Password Request Code (proposed) exhibits. \*The only difference between the two Password Request Code versions is the railroad employee version (U.S) asks for city, state and zip code. The foreign version asks for province, country, postal code.**

To receive a PRC, the RRB requests that the following information be provided in all cases; the railroad employee's name, Social Security Number, date of birth and mailing address. After submission of the required data, the PIN/Password system validates the information received against existing RRB electronic records to authenticate the identity of the individual. Once the information has been validated, the system randomly assigns a PRC. The PRC is mailed to the last known address of RRB record via RRB Form Letter GL-60, Important Information About Your RRB Internet Services Account, and allows a user to establish a PIN and password online. Once the PIN/Password is established, the user has access to RRB Internet-based applications.

**The RRB proposes no changes to the PIN/PASSWORD screens.**

3. Planned use of technology or technical/legal impediments to further burden reduction – This information collection allows RRB customers to request a Password Request Code (PRC) and subsequently establish an individual PIN/Password; the initial steps in providing the option of conducting transactions with the RRB on a routine basis through the Internet.
4. Efforts to identify duplication and other improvements – This information collection does not duplicate any other information collection.
5. Small business respondents – N.A.
6. Consequences of less frequent collections – None. Completion is voluntary.
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 78399 of the December 22, 2008 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-51, Railroad Retirement Board's PIN/Password Master File System. A Privacy Impact Assessment for the PIN/Password System can be found at [http://www.rrb.gov/pdf/PIA/PIA\\_RRA\\_RUIA\\_PPW\\_2-27-2009\\_public.pdf](http://www.rrb.gov/pdf/PIA/PIA_RRA_RUIA_PPW_2-27-2009_public.pdf)
11. Sensitive questions – There are no questions of a sensitive nature.
12. Estimate of respondent burden

**Current Burden**

	Annual Responses	Time (min)	Burden (Hrs)
PRC	14,040	5.0	1,170
Pin/Password	14,040	1.5	351
Total	28,080		1,521

**Proposed Burden**

	Annual Responses	Time (min)	Burden (Hrs)
PRC	9,756	5.0	813
Pin/Password	9,756	1.5	244
Total	19,512		1,057

**Burden Change**

Responses    Hours

Total	<u>-8,568</u>	<u>-464</u>
Adjustment	-8,568	-464

13. Estimate of annual cost burden to respondents or recordkeepers – N.A.
14. Estimate of cost to Federal Government. N.A.
15. Explanation for changes in burden – The proposed burden is calculated based on actual usage of the PIN/Password system. We have shown the **decrease** of 8,568 annual responses and -464 burden hours as an adjustment.
16. Time schedule for data collections and publications – The results of this collection will not be published.
17. Request not to display OMB expiration date – The Password Request code associated with reprogramming the screens will be seldom revised. Given the costs associated with reprogramming the screens in order to keep the appropriate OMB expiration date in place, the RRB requests authorization to **not** display the expiration date on the screens.
18. Exceptions to the certification statement – None