

Justification  
**Repayment of Debt**  
Form G-421f

1. Circumstances of information collection - Section 2 of the Railroad Retirement Act (RRA) (45 USC 231a) provides for payment of annuities to railroad employees who are retired due to age or disability and annuities or benefits to their eligible spouses, divorced spouses and survivors.

Section 2 of the Railroad Unemployment Insurance Act (RUIA) (45 USC 352) provides for the payment of benefits to qualified railroad employees who are temporarily unable to work due to unemployment.

When an overpayment of RRA or RUIA benefits has occurred, prompt action is initiated to notify the annuitant of the overpayment and the method by which the debt may be liquidated. The overpayment recovery methods available are cash refund by check, money order, credit card and withholding benefits due.

RRB procedures pertaining to RRA benefit and annuity overpayment determinations and recovery are prescribed in 20 CFR Part 255. RUIA procedures pertaining to benefit overpayment determinations are prescribed in 20 CFR Part 340.

2. Purposes of collecting/consequences of not collecting the information –  
The RRB implemented the option of debt repayment by credit card in 1989.

The RRB utilizes **Form G-421f, Repayment by Credit Card** to obtain information needed to allow for repayment of the debt by credit card, in addition to the more customary form of repayment, by personal check or money order.

The form is utilized by various internal organizations within the RRB. Depending on circumstances, Form G-421f, is sent from various internal organizations along with correspondence, associated debt-recovery forms and/or notices of delinquent debt.

For example, when sent by RRA Office of Programs staff to collect debts, the G-421f can be sent with Form G-66 or G-66b (both titled, Your Rights to Review and Waiver), Form G-66a (titled Rights Request Form) and/or any one in a series of G-421 forms i.e. Form G-421, titled Repayment Method. When sent by Debt Recovery staff, Form G-421f is sent with any one of a series of form letters, such as Form DR-422a, Response to Debt Notice.

When used with RUIA-related debt, the G-421f is sent with **initial** notices of delinquent debt i.e., RRB Form DR-422a, Response to Debt Notice, or **final** notices of delinquent debt, i.e., Form DR-422D, Response to Debt Notice, which are sent with final notices of delinquent debt

A G-421f is only completed when a credit card repayment option is selected. After furnishing pertinent identifying information, the respondent completes the credit card authorization portion of the form to designate which of the four authorized credit cards is being used, along with the credit card number and expiration date.

A pre-addressed return envelope is furnished to the respondent for mailing the recovery option form plus Form G-421f, if the credit card option is selected. Upon receipt, an RRB debt recovery specialist enters the information into the Pay.gov system for processing.

Completion of Form G-421f is voluntary.

**The RRB proposes minor non-burden impacting editorial changes, primarily to rename the Privacy Act/Paperwork Reduction Act Notice, to Form G-421f.**

3. Planned use of improved information technology or technical/legal impediments to further burden reduction - Not cost effective because of 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 - Less frequent collection of the information would adversely affect recovery of amounts owed to the RRB due to benefit overpayments under the RRA and RUIA.
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 48106 of the September 21, 2009 Federal Register. No requests for information or comments were received. RRB personnel consult with Department of Treasury (Financial Management Service) and Mellon bank representatives.
9. Payments or Gifts to Respondents - N.A.
10. Confidentiality – Privacy Act System of Record, RRB-21, Railroad Unemployment and Sickness Insurance Benefit System – 40 FR36275. Amended at 43 FR43642, 45 FR1637577, 48 FR22398-99, 48 FR28378-79, 51 FR4677, 52 FR632, 59 FR41351.

Privacy Act System of Records, RRB-22, Railroad Retirement Survivor and Pensioner Benefit System – 40 FR36268. Amended at 41 FR35238, 42 FR47469, 43 FR27267, 43 FR43642, 45 FR16370, 45 FR80391, 46 FR40843-44, 48 FR 22398-99, 49 FR33516-17, 51 FR4677-78, 52FR 632, 57 FR2888. A Privacy Threshold Analysis (PTA) for OMB Information Collection 3220-0169 has been completed by the RRB's Chief Privacy Officer. There is no requirement for a Privacy Impact Analysis (PIA) as this is a paper-based form. Electronic processing is through Pay.gov, which is a U.S. Treasury IT System.

11. Sensitive questions - There are no questions of a sensitive nature.

12. Estimate of respondent burden

The estimate of respondent burden is unchanged from that previously approved by OMB:

	Current	Burden	
Form	Annual Responses	Time (Min)	Burden (Hrs)
Form G-421f (RRA activity)	200	5	17
Form G-421f (RUIA) activity	100	5	8
<b>Total</b>	<b>300</b>		<b>25</b>

13. Estimate of annual cost to respondents or recordkeepers - N.A.

14. Estimated cost to Federal government - N.A.

15. Explanation for change in burden - N.A.

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 G-421f is seldom revised. Given the costs associated with redrafting 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