

Justification
Vocational Report
 RRB Form G-251

1. Circumstances of information collection - Section 2 of the Railroad Retirement Act (RRA) provides for payment of disability annuities to qualified employees and widow(er)s. The establishment of permanent disability for work in the applicant's "regular occupation" or for work in any regular employment is prescribed in 20 CFR 220.12 and 220.13, respectively.
2. Purposes of collecting/consequences of not collecting the information - To enable the Railroad Retirement Board (RRB) to determine the effect of a disability on an applicant's ability to work, the RRB needs the applicant's work history. The RRB utilizes Form G-251, Vocational Report, to obtain this information.

Form G-251 is provided to all applicants for employee disability annuities and to those applicants for a widow(er)'s disability annuity who indicate that they have been employed at some time. Form G-251 is designed for use with the RRB's disability benefit application forms. Form G-251 is similar to Form SSA-3369-BK, OMB 0960-0578.

The RRB proposes the following non-burden impacting editorial changes, intended to provide clarity to the following item(s) on Form G-251.

- **Item 7 to stress that the applicant must enter jobs within and outside the railroad industry;**
 - **Item 7 to enter the name as well as the type of the business entered;**
 - **Item 7a-c to have the applicant indicate if the business is railroad or non-railroad;**
 - **The top of page 2, 3, and 4 to include instructions to only complete the page that corresponds to the job entered on Item 7. (a job entered in Item 7a is described in on page 2; Item 7b is described on page 3, and Item 7c is described on page 4);**
 - **Corresponding Items 14c(3), 17c(3) and 20c(3) to change Weight Frequently Lifted/Carried to "Weight Most Often Lifted/Carried" and remove the word "frequently" since it is used for an entirely different purpose in other items and is defined in the footnote;**
 - **Footnotes 1 and 2 on pages 2, 3, and 4, to clarify what one- and two- thirds represent in a normal 8 hours (21/2 and 5 hours, respectively).**
3. Planned use of improved information technology or technical/legal impediments to further burden reduction – Not practical because form is initiated by the RRB and is part of a larger process that requires a face-to-face interview.
 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 - Not applicable as the information is solicited only once.
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 this information collection. The notice to the public was published on page 56244 of the October 30, 2009, Federal Register. No comments or requests for additional information were received from the public.
9. Payments or gifts to respondents - N.A.
10. Confidentiality- Privacy Act Systems of Records RRB-22, Railroad Retirement, Survivor and Pensioner Benefit System.
11. Sensitive questions - N.A.
12. Estimate of respondent burden-The estimated burden for this collection is unchanged as follows:

Current Burden

Form #	Annual Responses	Time (Min)	Burden (Hrs)
G-251 (with assistance)	5,730	30	2,865
G-251 (without assistance)	270	40	180
Total	6,000		3,045

We estimate that approximately 5,730 employee disability applicants and 270 widow(er) disability applicants complete Form G-251 annually. Present experience is that on the average, employee applicants will report three jobs during the 15-year period. We estimate that approximately 4.5 percent of all G-251's are self-administered.

13. Estimated annual cost to respondents or record keepers - N.A.
14. Estimate of cost to Federal government - N.A.
15. Explanation for change 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 G-251 is seldom revised. Given the costs associated with redrafting, reprinting and distributing the form in order to display the current OMB expiration date, the RRB requests that OMB not require the RRB to display the OMB expiration date on the form.
18. Exceptions to Certification Statement -
None