

Justification
**Application and Claim for Unemployment
 Benefits and Employment Service**
 RRB Forms UI-1, UI-1 (Internet), UI-3, UI-3 (Internet)

1. Circumstances of information collection - Section 2 of the Railroad Unemployment Insurance Act (RUIA) provides unemployment benefits for qualified railroad employees. These benefits are generally payable for each day of unemployment in excess of four during a registration period (normally a period of 14 days). Section 12 of the RUIA provides that the RRB (Railroad Retirement Board) establish, maintain, and operate free employment facilities directed toward the reemployment of railroad employees. Since September 1989, railroad employees have been able to apply for and claim unemployment benefits by mail. Forms UI-1 and UI-3 are prescribed for this purpose. Since October 2003, they have been able to apply for unemployment benefits via the Internet. Since November 2004, they have been able to apply for and file claims for benefits via the Internet.

The procedures for applying for unemployment benefits and employment service and for registering and claiming benefits by mail are prescribed in RRB regulation 20 CFR 325. 20 CFR 321, Electronic Filing of Applications and Claims for Benefits Under the Railroad Retirement Act, provides for applying and claiming RUIA benefits via the Internet.

2. Purposes of collecting the information - **Form UI-1, Application for Unemployment Benefits and Employment Service**, is used by a railroad employee to apply for unemployment benefits and gain automatic access to the employment service maintained by the RRB (a free job placement service for experienced railroad workers who have lost their jobs). Under RRB regulations, the UI-1 is completed by the claimant only once in each benefit year, at the time of the first registration. Form UI-1 can be obtained from the employer, labor organization, nearest RRB office or downloaded from the RRB's Web Site at www.rrb.gov. Along with each Form UI-1, informational booklet UB-10, Unemployment Benefits for Railroad Employees, is furnished to the claimant with an envelope preprinted with the address of the field office to which the completed form is to be mailed. The UB-10 contains specific instructions for the completion of the UI-1 and any subsequent Form UI-3, Claim for Unemployment Benefits, filed by a claimant. The UB-10 also contains the Privacy Act/Paperwork Reduction Act Notices and burden estimates for these two forms.

The RRB field office, which receives a completed UI-1, adjudicates the application and enters the information needed to create an unemployment insurance record, into a computer terminal linked to RRB headquarters for storage on disc and later batch processing in the daily RUIA claims processing system.

The RRB proposes no changes to Form UI-1.

Form UI-1 (Internet), Application for Unemployment Benefits and Employment Service, provides railroad employees with an Internet filing option as a part of the RRB's overall plan to provide its customers with the option to submit information or to transact business electronically, when practical, as a substitute for paper.

Before a UI-1(Internet) can be filed, an applicant must apply for a PRC (Password Request Code) from the RRB. After receiving the PRC from the RRB, the applicant can establish a PIN/Password (OMB approved 3220-0198) online. Once a PIN/Password has been established, the applicant has access to all RRB Internet-based services.

The information collected on the UI-1 (Internet) essentially mirrors the information collected on the manual version UI-1. The UI-1 (Internet) however, takes advantage of opportunities to electronically edit and skip unnecessary items and includes a pop-up screen associated with Item 8a "Date you want your first claim to begin." If the date the applicant enters is more than 30 days before the current date, the pop-up screen asks the applicant for a late-filing reason. This additional question eliminates the need to release RRB Form ID-10a, Notice of Late Filing of Unemployment Application, and the need to reset benefit beginning dates in response to returned questionnaires. Timely applicants do not see the screen.

The process also improves customer service in Item 16, which collects bank account information needed to pay benefits by direct deposit. It allows for running the applicant's Routing Transit Number against the Financial Organization Master File to ensure we have a valid number. It provides the applicant the opportunity to correct the routing transit number and confirm the bank's name online. The improved quality of the information collected reduces delays associated with contacting applicants to clarify or correct such information.

Upon completion of Sections A through E, a review screen appears that recaps the information provided to that point, which the applicant can then review and/or modify. Section F provides for the certification of the information and the submission of the application or the deletion of the application entirely.

The RRB proposes no changes to Form UI-1 (Internet).

Form UI-3, Claim for Unemployment Benefits, is used by an employee to claim unemployment benefits for days of unemployment in a particular registration period; normally a period of 14 days. A Form UI-3, or in cases of delayed registration, multiple Forms UI-3, are released from RRB headquarters directly to the claimant. Release of the UI-3 is triggered by the automated processing of an application (Form UI-1) or a claim (Form UI-3) for the previous period. The RRB field office receives and adjudicates the claim and then enters the information into

the claimant's record by means of a computer terminal linked to RRB headquarters. Notice of this claim and any subsequent claims are sent to the claimant's railroad employer for pre-payment verification.

The RRB proposes no changes to Form UI-3.

Form UI-3 (Internet), Claim for Unemployment Benefits, provides railroad employees with an Internet filing option as a part of the RRB's overall plan to provide its customers with the option to submit information or to transact business electronically, when practical, as a substitute for paper.

Before the UI-3 (Internet) can be filed electronically, an applicant must apply for a PRC (Password Request Code) from the RRB. After receiving the PRC, the applicant can establish a PIN/Password (OMB approved 3220-0198) online. Once the PIN/Password has been established, the applicant has access to all RRB Internet-based services.

The information collected on the UI-3 (Internet) essentially mirrors the information collected on the manual UI-3. The Internet equivalent UI-3, however, takes advantage of opportunities to electronically edit and skip unnecessary items and includes a pop-up screen associated with Item 1a. The time limit for filing a claim is 15 days from the last day of the claim period or 15 days from the date the form was available on the Internet, whichever is later. If the claim will be filed late, the pop-up screen will ask the applicant for a late filing explanation. Timely applicants do not see the screen.

Upon completion of Questions 1 through 7, a review screen appears that recaps the information provided to that point, which the applicant can then review and/or modify. The review screen enables the claimant to certify the information and submit the claim, or to delete the claim entirely. It also enables claimants who have already chosen payment by direct deposit to update their bank information, or to switch to payment by check due to hardship.

The RRB proposes no changes to Form UI-3 (Internet).

To our knowledge, no other agency obtains information similar to that obtained by Forms UI-1, UI-1 (Internet), UI-3 and UI-3 (Internet).

3. Planned use of improved information technology or technical/legal impediments to further burden reduction – Both forms are available for completion over the Internet. The RRB has no plans to further automate the process at the present time.
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 - Form UI-1 is completed by an employee when making the first registration for UI benefits in a given year (20 CFR 325). Less than current information would adversely affect employment service actions and verification of claimed employment and other items needed for determination of eligibility. Filing of Form UI-3 every 14 days is mandated by law (section 1(h) of the RUIA).
7. Special circumstances - N.A.
8. Public comments/consultations outside the agency - In accordance with 5 CFR 1320.8(d), initial comments were invited from the public regarding the information collection. The notice to the public was published on page 65388 of the October 22, 2010, Federal Register. No comments or requests for additional information were received.
9. Payments or gifts to respondents - None
10. Confidentiality
Form UI-1 - Privacy Act System of Records RRB-7, Applications for Unemployment Benefits and Placement Service under the Railroad Unemployment Insurance Act.

Form UI-3 - Privacy Act System of Records RRB-21, Railroad Unemployment and Sickness Insurance.

In accordance with OMB Circular M-03-22, a Privacy Impact Assessment for the information collection was completed and can be found at <http://www.rrb.gov/pdf/PIA/PIA-BPO.pdf>
11. Sensitive questions - N.A.
12. Estimate of respondent burden - The current and estimated burden for this collection follows:

Current Burden

Form Number	Annual Responses	Time (Minutes)	Burden (Hours)
UI-1	9,257	10	1,543
UI-1 (Internet)	720	10	120
UI-3	65,035	6	6,504
UI-3 (Internet)	9,291	6	929
Total	84,303		9,096

Proposed Burden

Form Number	Annual Responses	Time (Minutes)	Burden (Hours)
UI-1	12,747	10	2,125
UI-1 (Internet)	3,416	10	569
UI-3	108,217	6	10,822
UI-3 (Internet)	37,951	6	3,795
Total	162,331		17,311

	Responses	Hours
Total Burden Change	+78,028	+8,215
Adjustment	+78,028	+8,215

13. Estimate of annual cost to respondents or record keepers - N.A.
14. Estimate of cost to Federal Government - N.A.

Explanation for changes in burden – The estimate has been revised upward to reflect an average of the actual responses received over the last three (3) benefit years. The number of unemployment applications and claims has increased primarily as a result of increased unemployment within the rail industry beginning in 2008 and as a result of the passage of two legislative acts that provided for the payment of extended unemployment benefits in 2009.

We have shown the increase of +78,028 responses and +8,215 burden hours as an adjustment.

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