

Justification
**Request to Non-Railroad Employer for
Information About Annuitant's Work and Earnings**
RRB Form RL-231-F

1. Circumstances of the collection - Under Section 2 of the Railroad Retirement Act (RRA), a railroad employee's retirement annuity or an annuity paid to the spouse of a railroad employee is subject to work deductions in the Tier II component of the annuity and any employee supplemental annuity for any month in which the annuitant works Last Pre-Retirement Non-Railroad Employment (LPE). The LPE is for the last person, company, or institution, other than a railroad employer, that employed an employee or spouse annuitant. Since a divorced spouse is not entitled to a Tier II benefit, LPE does not affect a divorced spouse annuity.

The employee, spouse, or divorced spouse Tier I annuity benefit is subject to work deductions under Section 2(f)(1) of the RRA for earnings from any non-railroad employer over the annual exempt amount.

The regulations pertaining to non-payment of annuities by reason of work and LPE are contained in 20 CFR 230.1 and 230.2.

2. Purposes of collecting/consequences of not collecting the information - **Form RL-231-F, Request to Non-Railroad Employer for Information About Annuitant's Work and Earnings**, is used by the RRB to obtain information needed to determine if any work deduction should be applied because an annuitant worked in non-railroad employment after the annuity beginning date. Form RL-231-F is mailed to an LPE employer by an RRB office when the RRB receives notice from the Social Security Administration (SSA) that an employee or spouse annuitant has been credited by an LPE employer with wages after retirement and the earnings were not reported to the RRB by the annuitant on Form G-19L, *Annual Earnings Questionnaire* (OMB No. 3220-0179). Form RL-231-F is also used when information supplied by the annuitant on Form G-19L needs to be supplemented for work deduction information.

Prior to releasing the RL-231-F to the LPE employer, the RRB office enters, identifying information about the annuitant and the year or years for which the work and/or earnings information is being requested. On the second page, the RRB checks the appropriate boxes (1-4) to request the employment and earnings information needed to determine the LPE. If box 3 is checked by the RRB, a date is also entered for the employer to use as the starting date for the earnings information needed. The employer returns the completed form to the RRB office in the pre-addressed envelope provided for that purpose.

The RRB proposes no changes to Form RL-231-F.

The LPE provision is unique to the RRA and consequently there is no comparable SSA form.

To our knowledge, no other agency uses a form similar to the RL-231-F.

3. Planned use of improved information technology or technical/legal impediments to further burden reduction - 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 - Not applicable since the information is requested only once for a report requiring further development of non-railroad earnings in excess of the annual exempt amount earned by an RRB annuitant who had non-railroad employment prior to retirement.
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 this information collection. The notice to the public was published on pages 65219, of the October 20, 2011, Federal Register. No comments or requests for additional information were received.
9. Payments or gifts to respondents - N.A.
10. Confidentiality - Privacy Act System of Records, RRB-22, Railroad Retirement, Survivor and Pension Benefits System. In accordance with OMB Circular M-03-22, a Privacy Impact Assessment for this 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 estimated annual burden for the information collection is unchanged as follows:

Form Number	Annual Responses	Time (Minutes)	Burden (Hours)
RL-231-F	300	30	150
Total	300	30	150

13. Estimated annual cost to respondents or record keepers - N.A
14. Estimate of cost to Federal Government - N.A.
15. Explanations for change in burden - N.A.
16. Time schedule for data collection and publication - The results of this collection will not be published.
17. Requests not to display OMB expiration date - The RL-231-F is a low usage form that is seldom revised. Given the costs associated with redesigning the form in order to keep

the appropriate OMB expiration date in place, the RRB requests the authority to not display the expiration date on the form.

18. Exceptions to Certification Statement - None