

**Justification
Job Information Report
RRB Form G-251a and G-251b**

1. Circumstances of information collection - The Railroad Retirement Act (RRA) was amended in 1946 to include Section 2(a)(1)(iv) which established occupational disabilities for career railroad employees. Section 2(a)2 of the RRA calls for railroad labor and management to establish and maintain standards that would permanently disqualify an employee from work in the railroad industry. In July of 1997, as a result of a cooperative effort between railroad labor and railroad management, the Railroad Retirement Board (RRB) adopted recommendations for new standards for the adjudication of occupational disabilities under the RRA. As part of these standards, the RRB requests job information used to determine an applicant's eligibility for an occupational disability from both railroad employers and railroad employees. Previously, the RRB formally requested job information from only the railroad employee, although railroad management has always had the opportunity to submit job information. The job information received from the railroad employer and the railroad employee is compared, reconciled if needed, and then used in the occupational disability determination process. The process of obtaining information from railroad employers to be used in determining an applicant's eligibility to an occupational disability is outlined in RRB regulation 20 CFR 220.13(b)(2)(E).

2. Purposes of collecting/consequences of not collecting the information - To determine entitlement to an occupational disability, the RRB currently determines if an employee is precluded from performing the full range of duties of his or her regular railroad occupation. This is accomplished by comparing the restrictions an impairment(s) causes against an employee's ability to perform his/her normal duties. To collect information needed 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 (OMB 3220-0141), to obtain this information from the employee applicant.

Note: 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.

Though the RRB now requests pertinent job information from employers, their responses are not required, but are voluntary. The employer is given thirty days from the date of the notice to respond. If the job information is received timely, it is compared to the job information provided by the employee. Any material differences are resolved by the RRB disability examiner. Once resolved, the information is compared to the restrictions caused by the medical impairment. If the restrictions prohibit the performance of the regular railroad occupation, the claimant is found occupationally disabled.

The RRB uses the following two forms to secure job information from the railroad employer. Details regarding the purpose and use of the two forms follow.

Form G-251a, Employer Job Information (Job Description), is used when an application for an occupational disability is filed by an employee whose regular railroad occupation is one of the more common types of railroad jobs (locomotive engineer, conductor, switchman, etc.). The RRB then releases Form G-251a to an employer accompanied by a *generic job description* for that particular railroad job. Generic job descriptions describe how these select occupations are generally performed in the railroad

industry, though performance may vary from railroad to railroad. Thus, the employer is given an opportunity to comment on whether the job description matches the employee's actual duties. If the employer concludes that the generic job description accurately describes the work performed by the applicant, no further action is necessary. If however, it is determined that the duties are different, the employer is given the opportunity to provide the RRB with a description of the actual job duties within thirty days from the date the form is released.

*Note: The generic job descriptions were prepared and approved by a joint committee consisting of representatives of railroad labor and railroad management.

The RRB proposes no changes to Form G-251a.

Form G-251b, Employer Job Information (General), is released to notify an employer when an application for an RRB occupational disability is filed by an employee whose regular railroad occupation does not have a generic job description. The employer is then given the opportunity to provide the RRB with job duty information within thirty days from the date the form is released. The type of information the RRB is seeking is outlined on the form.

The RRB proposes no changes to Form G-251b.

3. Planned use of improved information technology or technical/legal impediments to further burden reduction – Low volume of this form relegates it to the lowest priority in the implementation of the employer reporting electronic initiative.
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 the information collection. The notice to the public was published on page 63359 of the October 16, 2012, Federal Register. The RRB received comments from the President of the Long Island Railroad regarding Forms G-251a and G-251b and RRB business processes with regard to the RRB's occupational disability program. The RRB's General Counsel responded. Both letters are included in the public comments section.
9. Payments or gifts to respondents - N.A.
10. Confidentiality - Privacy Act Systems of Records RRB-22, Railroad Retirement, Survivor and Pensioner Benefit 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 current burden for the collection is unchanged as follows:

Current burden

Form Number	Annual Responses	Time (Minutes)	Burden (Hours)
G-251a	125	20	42
G-251b	305	20	102
Total	430		144

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 RRB anticipates that the G-251a and G-251b will be 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 forms.
18. Exceptions to Certification Statement – N.A.