

Justification
Student Beneficiary Monitoring
 RRB Forms G-315, G-315A, and G-315A.1

1. Circumstances of information collection - Under the provisions of the Railroad Retirement Act (RRA), there are two types of benefits payments that are based on the status of a child being in full-time elementary or secondary school attendance at age 18-19:
 - a survivor child's annuity benefit under section 2(d)(1)(iii) and
 - an increase in the employee retirement annuity under the Special Guaranty computation as prescribed in section 3(f)(2) and 20 CFR 229.

The survivor student annuity is usually paid by direct deposit to a financial institution either into the student's checking or savings account or into a joint bank account with a parent.

The requirements for eligibility as a student are prescribed in 20 CFR 216.74, and include students in independent study and home schooling. The evidence to obtain benefits based on full-time elementary or high school attendance at an educational institution is prescribed in 20 CFR 219.54 and 219.55.

In survivor cases, Form AA-19, Application for Child's Annuity (OMB No.3220-0030), is required if the student is age 18-19 at initial entitlement. When the child is under age 18 at initial entitlement, Form AA-19 is filed on behalf of the child, for a minor child's annuity, and protects the child's rights to student benefits at attainment of age 18, provided there is no break in entitlement between the month the child attains age 18 and the month the child becomes entitled as a full-time student. A new Form AA-19 is not required at attainment of age 18.

2. Purposes of collecting the information - For the Railroad Retirement Board (RRB), to satisfy itself that a child is entitled to student benefits, the RRB requires evidence of full-time school attendance. Such evidence is to include a signed statement from the child that s(he) is attending full-time elementary or secondary school, and is not being paid by an employer to attend school, and either:
 - a statement from the school registrar verifying that the child is attending school full-time, or
 - when applicable, copies of the documentation approving the home schooling of the child at the elementary or secondary school level.

The forms used by the RRB to develop the evidence needed as proof of full-time elementary or secondary school attendance follow.

RRB Form G-315, Student Questionnaire, is used to obtain the information needed for full-time elementary or secondary school attendance (a) when the student is age 18-19 at initial entitlement to the survivor annuity, (b) when the child annuitant attains age 18 and qualifies as a full-time student, and (c) for student monitoring. For student monitoring, Form G-315 also obtains information on a student's marital status, social security benefits, and employment. When the G-315 is mailed by an RRB field office to the student or the representative payee, the field office enters the identifying information in Section A, Items 1-3, and the title of the school certifier in Section B. The identifying information and title

of the school certifier are also entered on the G-315's transmittal Form RL-315, Cover Letter to Form G-315 before both forms are released. After completing the remainder of the G-315, the student or representative payee obtains school verification, in Section B, of the information provided on the form and returns the form to the RRB field office in the pre-addressed return envelope provided for such purpose.

Form G-315 is similar to the *Student's Statement Regarding School Attendance* on page 2 of the Social Security Administration's (SSA) Form SSA-1372-BK, Advance Notice of Termination of Child's Benefits (OMB No. 0960-0105). However, the RRB does not release Form G-315 to all children attaining age 18. The student must contact the RRB field office and request it.

When used for student monitoring, Form G-315 is similar to the SSA-1383, Student Reporting Form (OMB No. 0960-0088). Though SSA instructs the student to return the form only when there is a change to be reported and does not send out any additional monitoring forms during the school year, the RRB sends out the Form G-315 for survivor student monitoring in September, December, March, at the end of the school year, or if earlier, at attainment of age 19 and requires the student return all of the monitoring forms.

Information booklet G-316, Railroad Retirement Benefits for Students Age 18-19 and In Elementary or Secondary School, is enclosed with Form G-315 at initial entitlement as a student. The booklet is also available at any RRB field office and at www.rrb.gov.

The RRB proposes to revise Form G-315 by removing the incorrect "go to" instruction from Item 10 and adding instructions below Item 10 for having Section B completed.

To our knowledge no other agency other than SSA uses a form similar to Form G-315.

RRB Form G-315A, Statement of School Official, is used to obtain verification from a school of a student's full-time attendance when a student fails to return a monitoring Form G-315. The field office enters its facsimile number as well as the identifying information on the accompanying Form RL-315A, Cover Letter to Form G-315A, and in Section A, Items 1-7 of Form G-315A, before the forms are released. The RRB information entered is based on the full-time attendance information provided by the student on a previous monitoring questionnaire. After the G-315A is completed it, along with Form RL-315A, is returned to the field office either by facsimile or by mail in the envelope provided for that purpose.

Form G-315A is similar to the *Certification by School Official*, on page 3, of SSA's Form SSA-1372-BK, Advance Notice of Termination of Child's Benefits (OMB No. 0960-0105). To our knowledge, no other agency other than SSA uses a form similar to Form G-315A.

The RRB proposes to add a line for the school official's printed name on Form G-315A.

RRB Form G-315A.1, School Official's Notice of Cessation of Full-Time School Attendance, is released by the RRB field office to a student's school after the completed Form G-315 or G-320, Student Questionnaire for Special Guaranty Computation (OMB 3220-0083), is returned by the student. The field office enters their facsimile number as

well as the identifying information and the title of the school certifier on both the G-315A.1 and its accompanying transmittal Form RL-315A.1, Cover Letter to Form G-315A.1, before both forms are released. The school retains Form G-315A.1 for future use in notifying the RRB when an event occurs that causes full-time attendance to end, which makes the student ineligible for future benefits based upon full-time school status. When/if Form G-315A.1 is returned, it is either faxed to the number the RRB provided or is mailed.

Form G-315A.1 is similar to the *Notice of Cessation of Full-time School Attendance*, on page 4, of SSA's Form SSA-1372-BK, Advance Notice of Termination of Child's Benefits (OMB No. 0960-0105). To our knowledge, no other agency other than SSA uses a form similar to Form G-315A.1.

The RRB proposes to add a line for the school official's printed name on Form G-315A.1.

3. Planned use of improved information technology or technical/legal impediments to further burden reduction – On-line completion is 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 - Forms G-315, G-315A, and G-315A.1 provide current information about individuals receiving benefits under the RRA based on full-time school attendance. Less than current information would adversely affect the RRB's determinations concerning a beneficiary's continued eligibility for benefits and could result in benefit overpayments by the RRB.
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 the information collection. The notice to the public was published on page 57988 of the September 26, 2014, Federal Register. No comments or requests for additional information were received.
9. Payments or gifts to respondents - None
10. Confidentiality - Privacy Act System of Records, RRB-22, Railroad Retirement, Survivor and Pension 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 this collection remains unchanged and is as follows:

Current Burden

Form Number	Annual Responses	Time (Minutes)	Burden (Hours)
G-315	860	15	215
G-315A	20	3	1
G-315A.1	20	2	1
Total	900		217

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