

Justification  
**Vocational Report**  
RRB Form G-251

EMERGENCY REQUEST FOR REVISION OF A CURRENTLY APPROVED COLLECTION

Note: This information collection is used by the RRB to obtain a disability applicant's work history and supplements the processing a disability application.

Changes are being proposed to Form G-251 in support of the RRB's Disability Program Improvement Project (DPIP) to enhance/improve disability case processing and overall program integrity as recommended by the RRB's Office of Inspector General and the Government Accountability Office. Disability case processing and related program integrity issues were also the topic of a 2015 Congressional Hearing by the House Committee on Oversight and Government Reform. After a long and thorough review and evaluation, the RRB is now ready to go forward with significant revisions to 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.

Changes are being proposed to Form G-251 in support of the RRB's Disability Program Improvement Project (DPIP) to enhance/improve disability case processing and overall program integrity as recommended by the RRB's Office of Inspector General and the Government Accountability Office.

Proposed changes include the consolidation and revision of existing items that request information about essential job duties performed and any exposure to environmental hazards; the expansion of existing items that provide information regarding an applicant's physical actions or work activities and the amount of time that they expend on such activities during an average 8 hour work day to include Balancing, Twisting/Turning, Crawling, Gripping/Holding, Foot Control, and Fine Manipulation; and the addition of new items that request information regarding any permanent working accommodations an employer may have made due to the employee's disability are also proposed.

**In addition to the required review under the Paperwork Reduction Act, revised Form G-251 was reviewed by staff from the RRB's Office of General Counsel (OGC)**

and Office of the Inspector General (OIG). The OIG advised that the changes were legally acceptable. The OIG provided no comments or objections. Subsequently, the revised form has been reviewed and approved for use (pending OMB approval) by the RRB's Board Members

**Specific changes to Form G-251 include:**

- Revise current Item 5 to include "Province" in the address field. It has been added to clarify to Canadian applicants the information that is required.
  - Revise current Item 6 to add an "Alternate Telephone Number" to provide an alternate method to contact the applicant.
  - Revise current Item 7 to create a second Note to provide additional instructions to the applicant to enter the corresponding job title at the top of pages 2, 4 and 6.
  - This application requests information for up to three different jobs. Current page 2 (Items 12a through 14c(1)-(3)); page 3 (Items 15a through 17c(1)-(3)); and page 4 (Items 18a through 20c(1)-(3)) request the same information about each individual job description listed. The changes requested below apply to all three job fields.
    - o Current Items 12a/b; 15a/b; and 18a/b
      - Consolidate information from current Item 12a (15a and 18a), with current Item 12b (15b and 18b). Current Item 12a requests the applicant identify the duties of their job position, and current Item 12b requests the applicant describe those duties in detail.
      - Renumber consolidated information to Item 12 (16 and 20).
    - o Current Items 13a/b; 16a/b; and 19a/b
      - Consolidate information from current Item 13a (16a and 19a), with current Item 13b (16b and 19b). Current Item 13a requests the applicant identify any environmental hazards they are exposed to, and current Item 13b requests the applicant describe the exposure.
      - Renumber consolidated information to Item 13 (17 and 21).
    - o Current Item 14b(13)a-b; 17b(13)a-b; and 20b(13)a-b
      - Expand on current Item 14b (17b and 20b) to request information regarding an applicant's physical actions or work activities and the amount of time that they expend on such activities during an average 8 hour work day to include Balancing, Twisting/Turning, Crawling, Gripping/Holding, Foot Control, and Fine Manipulation.
      - Renumber current Items 14c(1)-(3); 17c(1)-(3); and 20c(1)-(3) as Items 14b(13) and (13)a-b; 18b(13) and (13)a-b; and 22b(13) and (13)a-b.
    - o Create **new Items 15a** in Yes/No format requesting if the employer has provided job accommodations due to the applicant's disability, and if so, to complete **new Item 15b**.
  - Other minor editorial changes.
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 17511 of the March 29, 2016 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. 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 burden for this collection is changed as follows:

**Current Burden**

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

**Proposed Burden**

Form Number	Annual Responses	Time (Minutes)	Burden (Hours)
G-251 (with assistance)	5,730	40	3,820
G-251 (without assistance)	270	50	225
Total	6,000		4,045

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.

	Responses	Hours
Total burden Change	-0-	+1,000
Adjustment	-0-	+1,000

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 - With additional items added to the application that will require more in-depth answers and/or narrative explanations from the employee, we propose the total burden hours will increase by 1,000 hours, from 3,045 to 4,045. The burden time for forms completed with assistance will increase by 10 minutes, from 30 to 40 and the burden hours will increase by 955, from 2,865 to 3,820. The burden time for forms completed without assistance will also increase by 10 minutes, from 40 to 50 and the burden hours will increase by 45, from 180 to 225. We have shown this increase 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 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