

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

EMERGENCY REQUEST FOR REVISION OF A CURRENTLY APPROVED COLLECTION

**Note:** The collection obtains information used by the Railroad Retirement Board (RRB) to assist in determining whether a railroad employee is disabled from his or her regular occupation, a critical piece of the RRB's Disability application process. It provides, under certain conditions, railroad employers with the opportunity to provide information to the RRB regarding an applicant job duties.

Changes are being proposed to the information collection in support of the RRB's Disability Improvement Project (DPIP) to enhance improve disability case processing and overall program integrity. Disability case processing and related program integrity issues have been the topic of RRB's Office of Inspector General and Government Accountability Office recommendations, as well as 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 of this information collection.

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)(iv)(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.

The RRB currently 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)**, which utilizes a narrative response format, 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 to obsolete current Form G-251a and replace it with a proposed Form G-251a.**

**Form G-251b, Employer Job Information (General)**, is currently 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 narrative information the RRB is seeking is outlined on the form.

**The RRB proposes to obsolete current Form G-251b as the information currently collected on it will now be collected on the new G-251A,**

We have included copies of the current Form G-251a and G-251b proposed for obsolescence in the supporting documentation section of our ROCIS submission.

**The RRB proposes implementation of a new version of Form G-251A, Railroad Job Information. In addition to the required review under the Paperwork Reduction Act, revised Form G-251a was reviewed by staff from the RRB's Office of General Counsel (OGC) and Office of the Inspector General (OIG). The OGC advised that the changes were legally acceptable. Subsequently, the revised form has been reviewed and endorsed for use (pending OMB approval) by the RRB's Board Members**

**Proposed Form G-251A, Railroad Job Information, which utilizes a combined narrative/structured question and answer format** will be released to an employer when one of their employees files an application for an occupational disability, requests the railroad employer provide: Information regarding whether the employee has been medically disqualified from their railroad occupation; a summary of the employee's duties; the machinery, tools and equipment used by the employee; the environmental conditions under which the employee performs their duties; all sensory requirements (vision, hearing, speech) needed to perform the employee's duties; the physical actions and amount of

time (frequency) allotted for those actions that may be required by the employee to perform their duties during a typical work day; any permanent working accommodations an employer may have made due to the employee's disability; as well as any other relevant information the employer may choose to include.

The RRB requests the pertinent job information from employers, their responses are not required, but are voluntary. Completing the report gives them the opportunity to comment on their employee's actual duties. The employer is given thirty days from the date of the G-251A notice to respond. If the job information is received timely, it is compared to the job information provided by the employee on Form G-251. 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.

After the report is completed, the employer signs and dates the report's Certification Section, and returns the completed report to RRB Headquarters.

The employee's identifying information at the top of the form is completed by the RRB before the form is released to the employer for completion. Completion instructions and the Paperwork Reduction Act and Privacy Act Notices are found on the form.

3. Planned use of improved information technology or technical/legal impediments to further burden reduction –The form is scheduled to be put in an on-line format utilizing the RRB's Employer Reporting System (ERS) sometime in FY 2017. A revised information collection requesting OMB approval of the new method of generation will be submitted to OMB for approval before implementation.
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 25724 of the April 29, 2016, Federal Register.
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 and proposed burdens for the collection is are shown below.

Current Burden

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

Proposed Burden

Form Number	Annual Responses	Time (Minutes)	Burden (Hours)
G-251A	500	60	500

	Responses	Hours
Total burden Change	+70	+356
Adjustment	+70	+356

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 - We propose to obsolete current Forms G-251A and Form G-251B and remove them from the collection.

We propose that the annual responses for new Form G-251A will be 500, it will take 60 minutes to complete the form, and the total burden hours will be 500.

This change increases the collection's annual responses by 70 from the previous 430 for the combined G-251A and G-251B, to the proposed 500 for the new G-251A; the completion time increases by 40 minutes, from 20 minutes to 60 minutes as the new Form G-251a requests significantly more information and the burden hours increase by 356, from 144 to 500. We are showing the 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 RRB anticipates that the G-251a 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.