

Justification
Representative Payee Parental Custody Monitoring
RRB Form G-99d

1. Circumstances of information collection - Under Section 12(a) of the Railroad Retirement Act, the Railroad Retirement Board (RRB) is authorized to select, make payments to, and conduct transactions with, a beneficiary's relative or some other person willing to act on behalf of the beneficiary as a representative payee. The RRB is responsible for determining if direct payment to a beneficiary or payment to a representative payee would best serve the beneficiary's interest.

Inherent in the RRB's authorization to select a representative payee is the responsibility to monitor the payee to assure that the beneficiary's interests are protected. Currently, the RRB has three categories of representative payees: (1) court appointed, (2) RRB appointed, and (3) parent-for-child. One-third of the payees in categories one and two are monitored by the RRB every year so that each payee reports on a triennial basis (OMB Information Collection 3220-0151, Representative Payee Monitoring). The RRB requires court-appointed payees to provide copies of the court accounting records and RRB-appointed payees to provide summarized accounting records.

All parent-for-child representative payees are monitored triennially to verify that the parent still retains custody of the child. The last monitoring was conducted in October 2011.

The monitoring of representative payee accountability by the RRB is prescribed in 20 CFR 266.7.

2. Purposes of collecting/consequences of not collecting the information - **Form G-99D, Parental Custody Report**, is computer-generated by the RRB when conducting the parent-for-child payee monitoring program, as the initial request for verification from the parent that they have custody of the child. The form is released from RRB headquarters directly to the payee, along with an envelope for its return to the responsible RRB field office shown in the lower portion of the form.

The parent-for-child payee's name and address and other identifying information in the top portion of the form and the name and address of the responsible field office shown in the bottom portion of the form are pre-filled before the form is released.

The RRB field office is responsible for controlling the return of the completed Form G-99D within 30 days. If the initial form is not returned within the 30 days, the field office releases a follow-up Form G-99D showing "SECOND REQUEST" printed at the top of the form. If the follow-up Form G-99D is not returned after 15 days, the field office secures completion of Form G-99C, Representative Payee Evaluation Report, OMB No. 3220-0151. If the returned Form G-99D indicates that the parent no longer has custody of the child, the field office initiates an investigation which could result in a suspension of benefit payments, or the designation by the RRB of another representative payee in place of the parent.

The RRB proposes no changes to Form G-99D.

3. Planned use of improved information technology or technical/legal impediments to further burden reduction - None planned at this time. Not practicable as form is issued by RRB with pre-filled data.
4. Efforts to identify duplication - This information collection does not duplicate any other RRB information collection.
5. Small business respondents - N.A.
6. Consequences of less frequent collection - Each payee will report on a triennial basis. Less frequent reporting would not be advisable considering the circumstances.
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 17299 of the April 10, 2017, Federal Register. No requests for further information or comments were received.
9. Payments or Gifts to Respondents - None
10. Confidentiality - Privacy Act System 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 <https://www.rrb.gov/sites/default/files/2017-06/PIA-BPO.pdf>.
11. Sensitive questions - There are no questions of a sensitive nature.
12. Estimate of respondent burden - The current and proposed estimated annual burden for this information collection is as follows.

Current Burden

Form Number	Annual Responses	Time (Minutes)	Burden (Hours)
G-99d	1,030	5	86
Total	1,030		86

Proposed Burden

Form Number	Annual Responses	Time (Minutes)	Burden (Hours)
G-99d	800	5	67
Total	800		67

	Responses	Hours
Total burden Change	-230	-19
Adjustment	-230	-19

13. Estimate of annual cost to respondents or record keepers - N.A.

14. Estimated cost to Federal Government - N.A.
15. Explanation for changes in burden - Due to record keeping which allows for an accurate count, we have decreased the annual responses by 230, from 1,030 to 800 and the burden hours by 19, from 86 to 67. We have shown these decreases as an adjustment.
16. Time schedule for data collection and publication - The results of this collection will not be published.
17. Request to not display OMB expiration date - The G-99d is seldom revised. Given the costs associated with redrafting, reprinting, and distributing the form in order to keep the appropriate OMB expiration date in place, the RRB requests authorization to not display the expiration date on the form.
18. Exceptions to Certification Statement - None