

Justification
Request for Internet Services

Request for Password Request Code (PRC) and PIN/Password Establishment

1. Circumstances of information collection - The Government Paperwork Elimination Act (GPEA) required Federal agencies to provide its customers with the option to submit information or transact business with agencies electronically, when practical, as a substitute for paper. The Railroad Retirement Board (RRB) has a Personal Identification Number (PIN) and Password system that provides RRB customers with the ability to apply for a Password Request Code (PRC) and subsequently establish an individual PIN/Password, which is the initial step to conducting online transactions with the RRB as required by the GPEA. The RRB's authority to collect the information needed to set up the PIN/Password account is Section 7(b)(6) of the Railroad Retirement Act (RRA).

2. Purposes of collecting/consequences of not collecting the information – The (PIN)/Password system provides railroad employees with the ability to conduct business with the RRB electronically. A portion of the system allows the RRB to collect and use information needed to establish a PRC for the applicant. Once the PRC is established, the RRB collects additional information from the applicant to establish a unique PIN/Password that allows access to the RRB's online services. The information collected is used exclusively to verify the identity of the requestor.

In meeting its primary mission for the payment of benefits under the Railroad Retirement Act (RRA) and the Railroad Unemployment Insurance Act (RUIA) the Railroad Retirement Board (RRB) collects personal identifying information, including name, social security number (SSN), and date of birth under the authority of Section 7(b)(6) of the RRA and Section 12(l) of the RUIA. Entitlement to and qualification for benefits are based on wage and compensation records, among other factors, which the RRB collects from employers and other Federal entities such as the Social Security Administration and the Internal Revenue Service.

As such, the RRB designed systems to maintain, store, and utilize this collected data that is reliant on the applicant's SSN as it allows us to verify the identity of an applicant using our website to apply for to the RRB's online service. Risks concerning re-disclosure and misuse of information associated with this information collection are mitigated accordingly.

The following screens are used to collect the necessary information:

- *Request for Password Request Code (railroad employee)
- *Request for Password Request Code (foreign version)
- Establish PIN/Password (Establish Internet Account)

***Depending on the response to the question, "Where does the railroad employee live?" the employee receives either a U.S version or a foreign version. Both options are included in the Request a Password Request Code exhibit. The only difference between the two versions is that the U.S. version asks for City, State and ZIP Code and the foreign version asks for Province, Country, and Postal Code.**

To receive a PRC, the RRB requests that the following information be provided in all cases; the railroad employee's name, Social Security Number, date of birth and mailing

address. After submission of the required data, the PIN/Password system validates the information received against existing RRB electronic records to authenticate the identity of the individual. Once the information has been validated, the system randomly assigns a PRC. The PRC is mailed to the last known address of RRB record via RRB Form Letter GL-60, Important Information About Your RRB Internet Services Account, and allows a user to establish a PIN and password online. Once the PIN/Password is established, the user has access to the RRB's online services.

The RRB proposes no changes to the PIN/Password screens.

NOTE: The RRB has had much internal discussion regarding this information collection. RRB staff has been in contact with the General Services Administration (GSA), the Postal Service and the National Institute of Standards and Technology (NIST) regarding one of their ongoing initiatives, the Federal Cloud Credential Exchange (FCCX) program. The aim of the FCCX initiative is to create a government-wide authentication portal that will allow individuals to use a single credential across multiple agency websites. No determination regarding the RRB's participation in this initiative has been reached at this time.

UPDATE: The RRB has determined not to use the Federal Cloud Credential Exchange program and is considering using GSA's Login.gov.

3. Planned use of technology or technical/legal impediments to further burden reduction - This information collection allows RRB customers to request a Password Request Code (PRC) and subsequently establish an individual PIN/Password; the initial steps in providing the option of conducting transactions with the RRB on a routine basis through the Internet. **We plan to work with the General Services Administration to establish Login.gov as an identity verifier. Login.gov is a single secure platform through which our railroad public will be able to log-in and access RRB services that currently require a PIN/Password. We hope to finalize memorandums of understanding with Login.gov and have it in place by the next information collection in 2020.**
4. Efforts to identify duplication and other improvements - This information collection does not duplicate any other information collection.
5. Small business respondents - N.A.
6. Consequences of less frequent collections - None. Completion is voluntary.
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 48730 of the October 19, 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-51, Railroad Retirement Board's PIN/Password Master File 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 burdens for the collection are as follows:

Current Burden

	Annual Responses	Time (Minutes)	Burden (Hours)
PRC	12,500	5.0	1,042
Pin/Password	20,000	1.5	500
Total	32,500		1,542

Proposed Burden

Form Number	Annual Responses	Time (Minutes)	Burden (Hours)
Request PRC	14,000	5.0	1,167
Establish Pin/Password	17,500	1.5	200
Total	31,500		1,367

	Responses	Hours
Total	<u>-1,000</u>	<u>-175</u>
Adjustment	-1,000	-175

13. Estimate of annual cost burden to respondents or record keepers - N.A.
14. Estimate of cost to Federal Government. N.A.
15. Explanation for changes in burden - The proposed burden is calculated based on actual usage of the PIN/Password system. The total annual responses have decreased by 1,000, from 32,500 to 31,500 and the total burden hours have decreased by 175, from 1,542 to 1,367. We have shown the decrease as an adjustment.
16. Time schedule for data collections and publications - The results of this collection will not be published.
17. Request not to display OMB expiration date - The Password Request Code associated with reprogramming the screens will be seldom revised. Given the costs associated with reprogramming the screens in order to keep the appropriate OMB expiration date in place, the RRB requests authorization to **not** display the expiration date on the screens.
18. Exceptions to the certification statement - None