

OMB SUPPORTING STATEMENT

RI 34-1 Financial Resources Questionnaire
RI 34-3 Notice of Amount Due Because of Annuity Overpayment
RI 34-17 Financial Resources Questionnaire (FEGLI Premiums Underpaid)
RI 34-18 Financial Resources Questionnaire (FEHB Premiums Underpaid)
RI 34-19 Notice of Amount Due Because of FEGLI Premium Underpayment
RI 34-20 Notice of Amount Due Because of FEHB Premium Underpayment

A. Justification

1. Title 31, Section 3716, requires aggressive agency action to collect all claims of the United States for money or property arising out of the agency's internal activity or referred to the agency for action under the Uniform Federal Claims Collection Standards (FCCS) [4 CFR Parts 101 through 105]. Under FCCS, the Office of Personnel Management (OPM) is required to pursue overpayments through every available mechanism, after providing due process, in order to satisfy the Government's interest in collecting money owed the Civil Service Retirement and Disability Fund. In making decisions regarding these collections, OPM is governed by 5 CFR, Part 831, Subparts M and N, Part 845, Part 870, Subpart D, and Part 890, which discuss recovery of overpayments and standards for waiver. Prior to commencement of collection activity, OPM must inform the annuitant of the overpayment or failure to pay premiums and establish that the money is owed and that the amount owed is mathematically correct. OPM must give the annuitant the opportunity to request waiver, compromise, termination, or suspension of collection, etc. The annuitant may want to pay the sum rather than have it collected. OPM must decide how to handle the transaction based on the annuitant's response and the personal financial information provided by the annuitant. In order to make a final decision in these matters and to meet the requirement of the current law and regulation, OPM must request and review information about the person's current financial circumstances. This information is necessary so that OPM can make a rational decision regarding the appropriate course of action.
2. The Notice of Amount Due Because of Annuity Overpayment (RI 34-3); the Notice of Amount Due Because of FEGLI Premium Underpayment (RI 34-19); and the Notice of Amount Due Because of FEHB Premium Underpayment (RI 34-20) are used to notify individuals about overpaid benefits and the intent of OPM to collect the overpayment. The Financial Resources Questionnaire forms (RI 34-1, RI 34-17, and RI 34-18) are used to collect financial data from overpaid individuals. The information collected is used by OPM to determine their ability to repay the debt owed to the Civil Service Retirement and Disability Fund, the Federal Employees' Group Life Insurance Trust Fund, and the Federal Employees Health Benefits Trust Fund, respectively. Based on this information and other material information, OPM may agree to a waiver, compromise, or adjustment of the collection schedule.

The information requested on RI 34-1 is collected by OPM from persons who owe the United States because of erroneous payments from the Civil Service Retirement and Disability Fund. After discovery of the erroneous payment, OPM uses RI 34-3 to notify the person who received the payment that the overpayment exists. The form provides the amount and cause of the overpayment, gives information about the right to request reconsideration, waiver, and/or compromise, as well as to request an adjustment in the collection schedule if (1) the person cannot repay in a lump sum and/or (2) the proposed installment collection schedule would cause financial hardship. RI 34-1 is an enclosure to RI 34-3. The person uses part 2 of RI 34-3 to inform OPM of his or her request for disposition of the overpayment. RI 34-1 is used by those wanting to be considered for waiver or compromise, write-off of the overpayment because of an inability to repay the debt because of financial hardship, or an

adjustment in the proposed collection schedule. OPM needs the detailed information from the RI 34-1 to make an informed decision to waive, accept a compromise, write-off or adjust the collection schedule. RI 34-17 performs the same function as the RI 34-1 and is used for underpayment of life insurance premiums. Similarly, RI 34-18 performs the same function as RI 34-1 and is used for the underpayment of health benefit premiums.

RI 34-19 performs the same function as RI 34-3 and is used for the underpayment of life insurance premiums. RI 34-20 performs the same function as RI 34-3 and is used for the underpayment of health insurance premiums.

Additionally, a minor textual change to RI 34-20 was made to Section E of “Your Rights Concerning This Underpayment of Premiums”. Section E-FINAL DECISION was revised to comport with existing due process language in forms RI 34-3 and 34-19.

There are editorial changes to the Privacy Act Statement (PAS) and the Public Burden Statement (PBS). The PAS has been revised due to a generic systematic overview by our Chief Privacy Officer.

3. The information collection is detailed and can only be obtained from the respondents. New methods of information collection technology would do little to reduce the burden on the respondents. Under penalty of law, respondents must sign the questionnaire attesting to its truthfulness. However, RI 34-1 and RI 34-17 are available in a PDF fillable format on our website and meet our GPEA requirements.
4. Duplication of this information is minimized. However, up-to-date, similar information certified by the applicant is not available elsewhere.
5. This information collection request has no impact on small businesses and organizations.
6. If OPM could not collect this information, it would prevent OPM from carrying out the intent of the Federal Claims Collection Act.
7. There are no special circumstances that would cause an information collection to be collected in the aforementioned manner. This information collection is consistent with the guidelines in 5 CFR 1320.6, except that a response is requested within 30 days in order to prevent the continuation of payments to which the respondent may not be entitled.
8. The information collection was published in the Federal Register on May 4, 2018. No comments were received.
9. No gift or payment is awarded respondents based on return of this form.
10. This information collection is protected by the Privacy Act of 1974 and OPM regulations (5 CFR 831.106). The routine uses of disclosure appear in the *Federal Register* for OPM/Central-1 (73 FR 15013, *et seq.*, March 20, 2008, effective April 21, 2008).
11. This information collection does not include questions of a sensitive nature, such as sexual behavior and attitudes, religious beliefs, and other matters that are commonly considered private. However, detailed financial information is collected so that OPM can make a reasonable decision about the debtor’s ability to repay.
12. Approximately 450 RI 34-1 forms are completed each year; approximately 70 forms each of RI 34-17 and RI 34-18 are completed each year. Approximately 1,351 forms of RI 34-3 are completed annually; approximately 210 forms of RI 34-19 and RI 34-20 are completed annually. A response time

of one hour is estimated for each form. Burden of 450 hours for RI 34-1; 70 hours each for RI 34-17 and RI 34-18; 1,351 hours for RI 34-3; and 210 hours for RI 34-19 and RI 34-20 equals 2,361 hours and is not expected to vary substantially.

Form Name	Form Number	No. of Respondents	No. of Responses per Respondent	Total Annual Burden (in hours)	Average Hourly Wage Rate	Total Annual Respondent Cost
Financial Resources Questionnaire;	RI 34-1	450	1	450	\$0	\$0
	RI 34-17	70	1	70		
	RI 34-18	70	1	70		
Notice of Amount Due Because...	RI 34-3	1,351	1	1,351		
	RI 34-19	210	1	210		
	RI 34-20	210	1	210		

13. There is no cost to the respondents.
14. Annualized cost to the Federal Government is approximately \$126,000. This cost is derived from employee salaries, staff hours required to process the forms and the cost of printing, storing and shipping forms.
15. There is a change to the respondent burden, due to a program change. Forms RI 34-18 and RI 34-20 have been added.
16. The results of this information collection are not published.
17. The Retirement Services program office is the lone processor of the data collected on these ICRs from approximately 2.8 million customers. The substance of each information collection does not substantively change at each OMB renewal cycle, but according to changes in law and regulation. These forms are printed and published (internet, intranet and on-board systems) through various agencies for distribution to and implementation by Government customers. Pursuant to title 5 CFR 1320.8(b)(1), it would not be appropriate to display the OMB clearance expiration date where the form will not be revised for the foreseeable future (e.g., because it is used to collect applicant, annuitant, or beneficiary information required by long-standing statutory provisions), where use of the paper form is prevalent, and where, accordingly, it will be expensive and burdensome to restock the paper forms inventory with a new version. Last year, under current practice, Retirement Services printed approximately 2 million documents subject to OMB clearance at a cost of approximately \$85,000. Our costs would rise substantially if additional revision cycles are added. Lastly, by adding the OMB clearance expiration date to the existing format, the end users of OPM's ICRs may erroneously assume that the expiration date affects the validity of the information collection when it is the OMB clearance expiration date and not reflective of the substance. This may lead to additional submissions by customers, possible litigation and increasing pressures on our Operations workloads. Therefore, we seek approval to not display the OMB clearance expiration date on the forms and to communicate version changes to the public via the revision date.
18. There are no exceptions to the certification statement.