

## OMB SUPPORTING STATEMENT

### RI 20-126 – Certification of Qualifying District of Columbia Service Under Section 1905 of Public Law 111-84

#### A. Justification

1. Section 1905 of Public Law 111-84 pertains to Retirement Credit for Service of Certain Employees Transferred from District of Columbia Service to Federal Service. In general, any individual who is treated as an employee of the Federal Government for purposes of chapter 83 or chapter 84 of title 5, U. S. Code, on or after October 28, 2009, or who performed qualifying District of Columbia service shall be entitled to have such service included in calculating creditable service under section 8332 or 8411 of title 5, United States Code, but only for purposes of meeting retirement eligibility. Form RI 20-126, Certification of Qualifying District of Columbia Service under Section 1905 of Public Law 111-84 is used by affected individuals and their survivors to request that their service is reviewed for meeting retirement eligibility.
2. RI 20-126 is available to employees covered under the Civil Service Retirement System (CSRS) or the Federal Employees Retirement System on or after October 28, 2009. Those eligible to apply include an applicant employed with the District of Columbia Courts; or an employee who performed service in an entity of the DC government whose functions were transferred to the Pretrial Services, Parole, Adult Supervision, and Offender Supervision Trustee; an employee of the Public Defender Service for the District of Columbia; and an employee of the DC Department of Corrections who was separated from service as a result of the closing of the Lorton Correctional Complex. When responses are received, an agency official must certify that certain service performed qualifies to meet retirement eligibility. However, the service cannot be used in the computation of annuity. The Privacy Act Statement has been revised due to a general systematic review by our Chief Privacy Officer and there are editorial changes to the Public Burden Statement. The Public Burden Statement meets the requirement of 5 CFR 1320.8(b)(3).
3. This information collection can only be obtained from the respondents. New methods of information collection would do little to reduce the burden on the respondents. This form is available in a PDF fillable format on our website and meets our GPEA requirements.
4. The forms are filed individually. Similar information is not available.
5. This information collection request has no impact on small businesses and organizations.
6. The collection of this information is performed as needed to determine the correct amount to pay annuitants and survivor annuitants.
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.

8. A 60-day notice of the proposed information collection was published in the *Federal Register* on November 28, 2018, as required by 5 CFR 1320, giving persons outside the agency an opportunity to comment on the form. No comments were received.
9. No payment or gift is made to the respondents.
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.
12. It is estimated that approximately 1,000 forms are expected to be processed annually. The form may require approximately 30 minutes for completion and an annual burden of 500 hours is estimated. The annual usage is expected to decrease in the future because the pool of persons affected is finite and they will only use this form once.

| 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 |
|---|-------------|--------------------|---------------------------------|--------------------------------|--------------------------|------------------------------|
| Certification of Qualifying District of Columbia Service Under Section 1905 PL 111-84 | RI 20-126   | 1,000              | 1                               | .5 hours                       | \$10.75                  | \$13,437.50                  |

13. The Total Annual Respondent Cost is \$13,437.50.
14. The annualized cost to the Federal government is \$5,550. This cost includes employee salary hours devoted to the program, forms publishing and overhead.
15. There is a change to the respondent cost burden due to an adjustment. We are now calculating indirect costs beyond burden time to complete this information collection.
16. The results of this 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 form, 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 versions changes to the public via the revision date.

18. There are no exceptions to the certification statement.