

Justification
Employer Service and Compensation Reports
RRB Forms UI-41 and UI-41a

1. Circumstances of information collection - Section 2(c) of the Railroad Unemployment Insurance Act (RUIA) (45 U.S.C. 352): (1) specifies the maximum normal unemployment and sickness benefits that may be paid in a benefit year, (2) provides for an extended benefit year for certain employees, and (3) allows for other employees to begin a benefit year early. The conditions for these actions are prescribed in 20 CFR 302.
2. Purposes of collecting/consequences of not collecting the information - All information about creditable railroad service and compensation needed by the RRB to administer section 2(c) is not always available from annual reports (OMB No. 3220-0008) filed by railroad employers with the RRB. When this occurs, the RRB uses the forms shown below to obtain, from railroad employers, supplemental information about service and compensation.

Form UI-41, Supplemental Report of Service and Compensation, is used to obtain information from railroad employers about service, compensation, and/or daily rates of pay occurring subsequent to information reported to the RRB on an annual report and which have been claimed by applicants for unemployment or sickness benefits on Form UI-23, Statement of Service for Railroad Unemployment Insurance Benefits, by letter, or in person.

The form is computer generated with the employee identifying information on the top portion of the form pre-filled by the RRB before release. In addition, the RRB checks the appropriate box(es) to indicate the type of compensation and/or service information required from the employer. The RRB also enters the months which the employee claims to have worked in a base year, as well as the appropriate monthly amount for each year over which the employer should not report. Completion of Form UI-41 is self-explanatory. After the report is completed, the employer signs and dates the report's Certification Section and returns the completed report to the RRB.

The Paperwork Reduction Act Notice is found on the form.

The RRB proposes no changes to Form UI-41.

Form UI-41a, Supplemental Report of Compensation, is used to obtain compensation information supplementary supplemental to that already on record. In most cases, the information reported by railroad employers through the annual reporting process (OMB No. 3220-0008) is sufficient for determining eligibility for, and amounts of, unemployment and sickness benefits payable. For about 150 claimants annually, however, it is necessary to obtain information on compensation over the maximum monthly creditable amount (\$1,455 in 2016, \$1,545 in 2017, and \$1,560 in 2018). In such cases, information is needed on monthly compensation at the base prescribed in section 2(c) of the RUIA (\$1,879 in 2016, 1,996 in 2017, and \$2,015 in 2018). Form UI-41a secures this information.

The form is computer generated with the employee identifying information and the year for which the compensation information is needed pre-filled on the form. The railroad employer enters, by month, the employee's total base year compensation (up to a

maximum amount per month). After the report is completed, the employer signs and dates the report's Certification Section and returns the completed report to the RRB address shown on the form.

The Paperwork Reduction Act Notice is found on the form.

The RRB proposes minor non-burden editorial changes to Form UI-41a. Changed title in PRA notice from Chief Information Resource Management to Associate Chief Information Officer for Policy and Compliance.

To our knowledge, no other agency uses forms similar to UI-41 or UI-41a.

3. Planned use of improved information technology or technical/legal impediments to further burden reduction – Not cost effective because of low volume; however, we will reevaluate after the completion of the RRB IT Modernization project.
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 collections – N/A
7. Special circumstances - None
8. 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 48381 of the September 13, 2019 Federal Register. No comments or requests for further information were received.
9. Payments or gifts to respondents - None
10. Confidentiality - Privacy Act System of Records - RRB 21, Railroad Unemployment and Sickness Insurance 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 – N/A
12. Estimate of respondent burden - The current and proposed burdens for the collection are shown below.

Current Burden

Form Number	Annual Responses	Time (Minutes) ^{1/}	Burden (Hours)
UI-41	100	8	13
UI-41a	50	8	7
Total	150		20

^{1/}The RRB has been collecting the information on these forms since OMB approved the

information collection. Based on a sampling done when the form was originally created, the office calculated the estimated time, which includes time for getting the needed data and reviewing the completed form.

13. Estimated annual cost to respondents or record keepers – N/A
14. Estimate of cost to Federal Government – N/A
15. Explanation for changes in burden – N/A
16. Time schedule for data collection - The results of this collection will not be published.
17. Request not to display OMB expiration date - The RRB started an extensive multi-year IT Modernization Initiative at the beginning of Fiscal Year 2019 to transform our operations into the 21st Century using multiple contractor services to improve mission performance, expand service capabilities, and strengthen cybersecurity. In addition, we received a new Chief Information Officer (CIO) on September 2, 2019 who is reviewing our estimated project timeline milestone dates. Once finalized, we will provide OMB with a consolidated project timeline.

Given that the forms in this collection are seldom revised; the costs associated with redrafting, reprinting, and distributing forms in order to keep the appropriate OMB expiration date in place; and our plan to reevaluate after the completion of the modernization project, **the RRB requests the authority to not display the expiration date on the forms.**

18. Exceptions to Certification Statement - None