

Justification
Vocational Report
RRB Form G-251

1. Circumstances of information collection - Section 2 of the Railroad Retirement Act (RRA) provides for payment of disability annuities to qualified employees and widow(er)s. The establishment of permanent disability for work in the applicant's "regular occupation" or for work in any regular employment is prescribed in 20 CFR 220.12 and 220.13, respectively.
2. Purposes of collecting/consequences of not collecting the information - To enable the Railroad Retirement Board (RRB) to determine the effect of a disability on an applicant's ability to work, the RRB needs the applicant's work history. The RRB utilizes Form G-251, Vocational Report, to obtain this information.

Form G-251 is provided to all applicants for employee disability annuities and to those applicants for a widow(er)'s disability annuity who indicate that they have been employed at some time. Form G-251 is designed for use with the RRB's disability benefit application forms. Form G-251 is similar to Form SSA-3369-BK, OMB 0960-0578.

The RRB proposes no changes to Form G-251.

3. Planned use of improved information technology or technical/legal impediments to further burden reduction - Not practical because form is initiated by the RRB and is part of a larger process that requires a face-to-face interview.
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 collection - Not applicable as the information is solicited only once.
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 this information collection. The notice to the public was published on page 59251 of the August 29, 2016 Federal Register. The RRB received joint comments from the President of the Sheet Metal, Air, Rail, and Transportation (SMART) Workers and the National President of the Brotherhood of Locomotive Engineers and Trainmen; as well as from the President of the Transportation Trades Department, AFL-CIO, regarding Form G-251 and RRB business processes with regard to the RRB's occupational disability program. The RRB's General Counsel responded. Both letters are included in the public comments section.
9. Payments or gifts to respondents - N.A.
10. Confidentiality - Privacy Act Systems 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 <http://www.rrb.gov/pdf/PIA/PIA-BPO.pdf>.

11. Sensitive questions - N.A.
12. Estimate of respondent burden - The current estimated burden for this collection is unchanged as follows.

Current Burden

Form Number	Annual Responses	Time (Minutes)	Burden (Hours)
G-251 (with assistance)	5,730	40	3,820
G-251 (without assistance)	270	50	225
Total	6,000		4,045

We estimate that approximately 5,730 employee disability applicants and 270 widow(er) disability applicants complete Form G-251 annually. Present experience is that on the average, employee applicants will report three jobs during the 15-year period. We estimate that approximately 4.5 percent of all G-251's are self-administered.

13. Estimated annual cost to respondents or record keepers - N.A.
14. Estimate of cost to Federal Government - N.A.
15. Explanation for change in burden - N.A.
16. Time schedule for data collection and publication - The results of this collection will not be published.
17. Request not to display OMB expiration date - The G-251 is seldom revised. Given the costs associated with redrafting, reprinting and distributing the form in order to display the current OMB expiration date, the RRB requests that OMB not require the RRB to display the OMB expiration date on the form.
18. Exceptions to Certification Statement - None