

## Justification

**Application and Claim for Unemployment Benefits and Employment Service**

RRB Forms UI-1, UI-1 (Internet), UI-3, UI-3 (Internet)

1. Circumstances of information collection - Section 2 of the Railroad Unemployment Insurance Act (RUIA) (45 U.S.C. 231) provides unemployment benefits for qualified railroad employees. These benefits are generally payable for each day of unemployment in excess of four during a registration period (normally a period of 14 days). Section 12 of the RUIA provides that the Railroad Retirement Board (RRB) establish, maintain, and operate free employment facilities directed toward the reemployment of railroad employees.

Railroad employees have been able to:

- apply for and claim unemployment benefits by mail using Forms UI-1 and UI-3 since September 1989.
- apply for unemployment benefits online since October 2003; and
- apply for and file claims for benefits online since November 2004.

The procedures for applying for unemployment benefits and employment service and for registering and claiming benefits by mail are prescribed in RRB regulation 20 CFR 325. The procedures for applying and claiming RUIA benefits electronically are prescribed in RRB regulation 20 CFR 321, *Electronic Filing of Applications and Claims for Benefits Under the Railroad Unemployment Insurance Act*.

2. Purposes of collecting the information - **Form UI-1, Application for Unemployment Benefits and Employment Service**, is used by a railroad employee to apply for unemployment benefits and gain automatic access to the employment service maintained by the RRB (a free job placement service for experienced railroad workers who have lost their jobs). Under RRB regulations, the UI-1 is completed by the claimant only once in each benefit year, at the time of the first registration. Form UI-1 can be obtained from the employer, labor organization, nearest RRB office or downloaded from the RRB's Web Site at [www.rrb.gov](http://www.rrb.gov).

Along with each Form UI-1, informational booklet UB-10, *Unemployment Benefits for Railroad Employees*, is furnished to the claimant with a preaddressed envelope to the RRB office to which the completed form is to be mailed. The UB-10 contains specific instructions for the completion of the UI-1 as well.

The RRB office, which receives a completed UI-1, adjudicates the application and enters the information needed to create an unemployment insurance record, into a computer terminal linked to RRB headquarters for storage on disc for later batch processing in the daily RUIA claims processing system.

**The RRB proposes no changes to Form UI-1.**

**Form UI-1 (Internet), Application for Unemployment Benefits and Employment Service**, provides railroad employees with an electronic filing option as part of the RRB's overall plan to provide its customers with the option to submit information or to transact business electronically, when practical, as a substitute for paper.

Before a UI-1 (Internet) can be filed, an applicant must establish a Login.gov account. Once the Login.gov account has been established, the applicant has access to all RRB Internet-based services.

The information collected on the UI-1 (Internet) essentially mirrors the information collected on the manual version of Form UI-1. The UI-1 (Internet) however, takes advantage of opportunities to electronically edit and skip unnecessary items and includes a pop-up screen associated with Item 8a "Date you want your first claim to begin." If the date the applicant enters is more than 30 days before the current date, the pop-up screen asks the applicant for a late-filing reason. This additional question eliminates the need to release RRB Form ID-10a, *Notice of Late Filing of Unemployment Application*, and the need to reset benefit beginning dates in response to returned questionnaires. Applicants who file timely do not see the screen.

The process also improves customer service in Item 16, which collects bank account information needed to pay benefits by direct deposit. It allows for running the applicant's Routing Transit Number against the Financial Organization Master File to ensure we have a valid number. It provides the applicant the opportunity to correct the routing transit number and confirm the bank's name online. The improved quality of the information collected reduces delays associated with contacting applicants to clarify or correct such information.

Upon completion of Sections A through E, a review screen appears that recaps the information provided to that point, which the applicant can then review and modify, if necessary. Section F provides for the certification of the information and the submission of the application or the deletion of the application entirely.

**The RRB proposes no changes to Form UI-1 (Internet).**

**Form UI-3, Claim for Unemployment Benefits**, is used by an employee to claim unemployment benefits for days of unemployment in a particular registration period; normally a period of 14 days. A Form UI-3 or, in cases of delayed registration, multiple Forms UI-3, are released from RRB headquarters directly to the claimant. Release is triggered by the automated processing of a UI-1 application or a UI-3 claim for the previous period. An RRB office receives and adjudicates the claim and then enters the information into the claimant's record by means of a computer terminal linked to RRB headquarters. Notice of this claim and any subsequent claims are sent to the claimant's railroad employer for pre-payment verification. The UB-10 booklet, *Unemployment Benefits for Railroad Employees*, which the applicant receives when originally filing the UI-1 application, contains completion instructions, the Paperwork Reduction Act and Privacy Act Notices, and the burden estimate for the UI-3.

**The RRB proposes no changes to Form UI-3.**

**Form UI-3 (Internet), Claim for Unemployment Benefits**, provides railroad employees with an Internet filing option as a part of the RRB's overall plan to provide its customers with the option to submit information or to transact business electronically, when practical, as a substitute for paper.

Before the UI-3 (Internet) can be filed electronically, an applicant must establish a Login.gov account. Once the Login.gov account has been established, the applicant has access to all RRB Internet-based services.

The information collected on the UI-3 (Internet) essentially mirrors the information collected on the manual Form UI-3. The Internet equivalent UI-3, however, takes advantage of opportunities to electronically edit and skip unnecessary items and includes a pop-up screen associated with Item 1a, which identifies the 14-day claim period. If a claim is filed later than 15 days from the last day of the claim period or 15 days from the date the form was available on the Internet, whichever is later, the pop-up screen asked the applicant for a late-filing reason. Applicants who file timely do not see the screen.

Upon completion of Items 1 through 7, a review screen appears that recaps the information provided to that point, which the applicant can then review and/or modify. The review screen enables the claimant to certify the information and submit the claim, or to delete the claim entirely. It also enables the claimant who has already chosen payment by direct deposit to update their bank information.

**The RRB proposes no changes to Form UI-3 (Internet).**

3. Planned use of improved information technology or technical/legal impediments to further burden reduction - Both forms are available for completion on the Internet. The RRB has no plans to further automate the process at the present time.
4. Efforts to identify duplication – To our knowledge, this information collection does not duplicate any other information collection or another agency uses forms similar to Forms UI-1, UI-1 (Internet), UI-3, and UI-3 (Internet).
5. Small business respondents - N.A.
6. Consequences of less frequent collection - Form UI-1 is completed by an employee when making the first registration for unemployment benefits in a given year (20 CFR 325). Less than current information would adversely affect employment service actions and verification of claimed employment and other items needed for determination of eligibility. Filing of Form UI-3 every 14 days is mandated by law (section 1(h) of the RUIA).
7. Special circumstances - N.A.
8. Public comments/consultations outside the agency - In accordance with 5 CFR 1320.8(d), initial comments were invited from the public regarding the information collection. The notice to the public was published on page 16687 of the March 24, 2020, Federal Register. No comments or requests for additional information were received.
9. Payments or gifts to respondents - None
10. Confidentiality
  - Form UI-1 - Privacy Act System of Records RRB-7, Applications for Unemployment Benefits and Placement Service under the Railroad Unemployment Insurance Act.
  - Form UI-3 - 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 the 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 estimated burden for this collection follows:

## Current Burden

Form Number	Annual Responses	Time (Minutes)	Burden (Hours)
UI-1	8,003	10	1,334
UI-1 (Internet)	5,542	10	924
UI-3	37,584	6	3,758
UI-3 (Internet)	45,011	6	4,501
<b>Total</b>	<b>96,140</b>		<b>10,517</b>

## Proposed Burden

Form Number	Annual Responses	Time (Minutes) <sup>1/</sup>	Burden (Hours)
UI-1	6,654	10	1,109
UI-1 (Internet)	4,357	10	726
UI-3	27,815	6	2,782
UI-3 (Internet)	42,836	6	4,284
<b>Total</b>	<b>81,662</b>		<b>8,901</b>

<sup>1/</sup>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.

	<b>Responses</b>	<b>Hours</b>
Total Burden Change	<u>-14,478</u>	<u>-1,616</u>
Adjustment	-14,478	-1,616

13. Estimate of annual cost to respondents or record keepers - N.A.
14. Estimate of cost to Federal Government - N.A.
15. Explanation for changes in burden - The estimated total number of responses has decreased by 14,478, from 96,140 to 81,662 and the burden hours have decreased by 1,616, from 10,517 to 8,901. These figures are based on the most recent record of responses received in 2019. We show the changes as an adjustment.
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 RRB started an extensive multi-year IT Modernization Initiative at the beginning of Fiscal Year 2019 to transform our operations into the 21<sup>st</sup> 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. We provided 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 desire 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 the Certification Statement - None