Justification Earnings Information Request Form G-19-F

- 1. <u>Circumstances of the collection</u> Under Section 2 of the Railroad Retirement Act (45 U.S.C. 231a), an annuity is not payable, or is reduced for any month in which the beneficiary works for a railroad or earns more than prescribed amounts. The provisions relating to the reduction or non-payment of annuities by reason of work are prescribed in 20 CFR 230.
- 2. <u>Purposes of collecting/consequences of not collecting the information</u> To obtain the information needed to determine if an annuity is not payable to an <u>applicant</u> because of earnings in excess of prescribed amounts, the Railroad Retirement Board (RRB) uses a series of basic application forms used to request specific information relating to an applicant's past, present, and future earnings. To obtain information needed for determining reductions in, or non-payment of, annuities currently being paid to <u>annuitants</u>, the RRB primarily relies on earnings information received from the Social Security Administration under a computer matching program agreement. The RRB also uses Form G-19L, Annual Earnings Questionnaire (OMB No. 3220-0179), and Form G-254, Continuing Disability Report (OMB No. 3220-0187).

In some cases, an applicant <u>or</u> annuitant fails to furnish the earnings information or enters erroneous information on an RRB form. In other cases, the RRB receives information from various sources relating to an applicant's or annuitant's earnings, including telephone calls or correspondence from the applicant or annuitant involved, other RRB forms used for monitoring earnings, and information received from the Social Security Administration. In these cases, the appropriate field office makes a telephone call to the applicant or annuitant or prepares Form G-19-F to request needed earnings information from applicants or annuitants. Rather than require each field office to prepare its own letter for each specific information request, and then have each applicant or annuitant furnish the earnings information with no to a standardized format, the RRB uses Form G-19-F. The form is used by all RRB field offices, thereby providing a standardized format for both the requesting and providing of the information.

Form G-19-F, Earnings Information Request, is used by the RRB to obtain earnings information when needed. The form is comprised of six information items, all of which pertain to an individual's employment for hire or self-employment for a time period of either 1 or 2 calendar years. The particular calendar year(s) for which the earnings information is needed is prefilled by the RRB field office in items 1 and 3, and, when appropriate, in items 4 and 5, before the form is released. The releasing field office also enters an "x" in the box provided on the left side of items 4, 5, and 6 indicating that a respondent is to complete that particular item or items. If for some reason, earnings information is needed for more than 2 calendar years, the RRB will furnish a second Form G-19-F for completion by the respondent.

The transmittal letter, which is part of Form G-19-F, provides additional instructions for the completion of Form G-19-F and for furnishing Forms W-2, Schedules SE, and Forms 1040, when applicable. The RRB office enters the applicant's or annuitant's RRB claim number in the top portion of the transmittal letter for identification purposes before its

release. A pre-addressed envelope is enclosed for the respondent to use to return the completed Form G-19-F.

The RRB proposes no changes to Form G-19-F.

- 3. <u>Planned use of improved information technology or technical/legal impediments to further</u> <u>burden reduction</u> – Given the low-usage of Form G-19F, the RRB does not plan to automate the form. The form is available for downloading from the RRB's website at www.RRB.gov.
- 4. <u>Efforts to identify duplication and other improvements</u> This information collection does not duplicate any other RRB information collection and to our knowledge, no other agency uses a form similar to RRB Form G-19-F.
- 5. <u>Small business respondents</u> N.A.
- 6. <u>Consequences of less frequent collection</u> Not applicable since the information is obtained only once for each incident involving omitted or erroneous information.
- 7. <u>Special circumstances</u> None.
- 8. <u>Consultations outside the agency</u> 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 57259 of the September 15, 2020, <u>Federal Register</u>. No comments or requests for additional information were received.
- 9. <u>Payments or gifts to respondents</u> None.
- <u>Confidentiality</u> Privacy Act System of Records, RRB-22, Railroad Retirement, Survivor and Pension Benefit System – RRB. In accordance with OMB Circular M-03-22, a Privacy Impact Assessment for this information collection was completed and can be found at<u>https://www.rrb.gov/sites/default/files/2017-06/PIA-BPO.pdf</u>.
- 11. <u>Sensitive questions</u> None.
- 12. <u>Estimate of respondent burden</u> The estimated burden for this collection is unchanged as follows.

Current Burden

Form Number	Annual Responses	Time (Minutes)1/	Burden (Hours)
G-19-F	900	8	120

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. <u>Explanation for changes in burden</u> N.A.
- 16. <u>Time schedule for data collections and publications</u> The results of this collection will not be published.
- 17. <u>Request not to display OMB expiration date</u> 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. 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, <u>the RRB requests the authority to not display the expiration</u> <u>date on the forms</u>.

18. Exceptions to Certification Statement - None