Justification Statement of Claimant or Other Person RRB Form G-93

 <u>Circumstances of information collection</u> - Pertinent information and proofs must be furnished to the Railroad Retirement Board (RRB) to support an application for an annuity under Section 2 of the Railroad Retirement Act (RRA) (45 U.S.C. 231a) or for unemployment benefits under Section 2 of the Railroad Unemployment Insurance Act (RUIA) (45 U.S.C. 352)). The RRB uses the information and/or proofs obtained, to help determine an applicant's entitlement to benefits.

In some cases, special circumstances require an applicant, or another person who has knowledge of the facts relating to the applicant's eligibility for an annuity or benefits, to provide a written statement supplementing or changing information previously provided by the applicant.

- <u>Under the railroad retirement program</u> the statement may relate to a change in an annuity beginning date; date of marriage or birth; railroad or non-railroad employment; an applicant's request for reconsideration of an unfavorable RRB eligibility determination for an annuity; or various other matters. The procedure for providing information for an RRA annuity determination is prescribed in 20 CFR 217.
- <u>Under the railroad unemployment and sickness programs</u> the statement may involve a variety of different situations relating to an RRB eligibility determination for unemployment and sickness benefits. The procedure for providing information for an RUIA benefit determination is prescribed in 20 CFR 320.
- 2. <u>Purposes of collecting/consequences of not collecting the information</u> In certain cases, to support an application for an annuity or unemployment benefits, the RRB needs to obtain, from applicants or other persons, supplemental or corrective information that is not requested by other RRB forms. In other cases, the applicant or another person who has knowledge of the facts may want to provide a written statement supplementing or changing information previously submitted. Form G-93 is used for these purposes.

Form G-93, Statement of Claimant or Other Person, is used by the RRB to correct information previously reported by an applicant or other person, and/or to obtain any additional information needed to help determine applicant eligibility for an RRA annuity or RUIA benefits not requested by other RRB forms. Form G-93 is generally completed by a respondent in an RRB office and in the presence of an RRB representative.

Form G-93 requests the following information:

- name of the railroad employee,
- name of the claimant (if other than the railroad employee),
- · relationship to the claimant of the person making the statement,
- social security number of the railroad employee,
- RR Retirement Annuity Claim Number (if different from social security number), and
- name of the person making the statement (if other than the claimant).

The signature block requests the signature, mailing address, telephone number, and date on which the statement is completed. If the signature is by mark ("X"), the signatures and

addresses of two witnesses are also required.

The RRB proposes no changes to Form G-93.

- 3. <u>Planned use of improved information technology or technical/legal impediments to further</u> <u>burden reduction</u> - Not cost effective because of low volume; however, the RRB will reevaluate after the completion of the RRB IT Modernization project.
- 4. <u>Efforts to identify duplication</u> Form G-93 is similar to Form SSA-795, *Statement of Claimant or Other Person*, OMB No. 0960-0046 and this information collection does not duplicate any other RRB information collection.
- 5. <u>Small business respondents</u> N.A.
- 6. <u>Consequences of less frequent collection</u> Not applicable as the information is obtained only once.
- 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 8620 of the February 15, 2022, <u>Federal Register</u>. No comments were received.
- 9. <u>Payments or gifts to respondents</u> None
- 10. <u>Confidentiality</u> Privacy Act Systems of Record, RRB-21, Railroad Unemployment and Sickness Insurance Benefit System and 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 <u>https://www.rrb.gov/sites/default/files/2017-06/PIA-BPO.pdf</u>.
- 11. <u>Sensitive questions</u> N.A.
- 12. <u>Estimate of respondent burden</u> The current and proposed estimated annual burdens for the collection are shown below:

Current Burden					
Form Number	Annual Responses	Time (Minutes)	Burden (Hours)		
G-93	60	15	15		

Proposed Burden

Form Number	Annual Responses	Time (Minutes) <u>1</u> /	Burden (Hours)
G-93	1,300	15	325

 $\underline{1}$ / The RRB has been collecting the information on these forms since OMB approved the information collection in 1991. 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.

	Responses	Hours
Total burden Change	<u>+1,240</u>	<u>+310</u>
Adjustment	+1,240	+310

- 13. Estimated annual cost to respondents or record keepers N.A.
- 14. Estimate of cost to the Federal Government N.A.
- 15. <u>Explanation for change in burden</u> The estimated total number of responses for this collection has increased starting in 2020 due to the increase in the annual number of employees affected by COVID-19 who were required to submit the form. We have shown the increase in annual responses and burden hours as an adjustment.
- 16. <u>Time schedule for data collections and publication</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. 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