

## Justification

**Designation of Contact Officials**

RRB Form G-117a (Paper) and Form G-117a (Internet)

1. Circumstances of information collection - Section 7(b)(6) of the Railroad Retirement Act (RRA) (45 U.S.C.231) gives the Railroad Retirement Board (RRB) the authority to require railroad employers to furnish information and records that are necessary for the administration of the Act. Further, Section 9 of the RRA and Section 6 of the Railroad Unemployment Insurance Act (RUIA) requires railroad employers to file reports of compensation of employees. This information serves as the basis for calculating retirement, disability, and survivor awards as well as the payment of unemployment and sickness benefits.
2. Purposes of collecting/consequences of not collecting the information - Coordination between railroad employers and the RRB is essential for the RRB to properly administer the payment of benefits under the RRA and the RUIA. In order to enhance timely coordination activity, the RRB utilizes Form G-117a, Designation of Contact Officials.

**Form G-117a (Paper), Designation of Contact Officials**, is used by railroad employers to notify the RRB of the official designated to coordinate various functions under the RRA and the RUIA with agency staff. The form provides the RRB with the name, title, address, phone number, facsimile number, and E-mail address of the contact. Completion is voluntary.

**The Railroad Retirement Board proposes to change the Form G-117a by adding updated language in section 12, Signature line. The language proposed is, "The above officials of this employer are authorized to serve in the capacities indicated and to act as trusted referees for the RRB in accordance with the National Institute of Standards and Technology (NIST) Special Publication 800-63A guidelines for online reporting access."**

**Form G-117a (Internet), Designation of Contact Officials**, is available to employers who request access to the form through the RRB's Employer Reporting System (ERS).

Access to ERS is granted only to employers and their designees who have completed Form BA-12, *Application for Employer Reporting Internet Access* (3220-0008), which provides information used by the RRB to evaluate, grant, and document the level of access requested (view only, data entry, or approval/submission rights).

The G-117a (Internet) consists of a series of screens that allows users to view the Contact Officials currently on file for the employer. Users will be able to edit and delete existing Contact Officials, as well as add new Contact Officials. The screen to edit and add Contact Officials collects essentially the same information as the approved paper Form G-117a. The internet version provides for the required notices and certifications, contains help messages to ensure users provide valid contact information, and prevents users from deleting Contact Officials without first providing a replacement.

**The RRB proposes no changes to the Form G-117a (Internet). The nonsubstantive request to allow the G-117a completion in ERSNet, allowing an electronic version of the form was approved August 9, 2022.**

3. Planned use of improved information technology or technical/legal impediments to further burden reduction – Recently, we have made available the Internet version of Form G-117a available, which is projected to reduce burden hours.
4. Efforts to identify duplication – To our knowledge, no other agency uses a form similar to Form G-117a and this information collection does not duplicate any other RRB information collection.
5. Small business respondents - N.A.
6. Consequences of less frequent collection - Completion is voluntary.
7. Special circumstances - N.A.
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 41994 of the June 28, 2023, Federal Register. No comments or requests for additional information were received.
9. Payments or gifts to respondents - None
10. Confidentiality - N.A.
11. Sensitive questions - N.A.
12. Estimate of respondent burden - The current and proposed burden for the collection is as follows.

**Current Burden**

Form Number	Annual Responses	Time (Minutes) <sup>1/</sup>	Burden (Hours)
G-117a	100	15	25
Total	100		25

<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.

**Proposed Burden**

Form Number	Annual Responses	Time (Minutes)	Burden (Hours)
G-117a (Paper)	25	15	6
G-117a (Internet)	200	5	17

Total	225		23
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	Responses	Hours
Total Burden Change	+125	-2
Adjustment	+125	-2

13. Estimated annual cost to respondents or record keepers - N.A.
14. Estimated cost to Federal Government - N.A.
15. Explanation for change in burden - The annual response total for the paper G-117a has been reduced to reflect the creation of Form G-117a (Internet). The paper G-117a allows users to add/edit all ten types of Contact Officials on a single form, which is reflected in the total annual responses and the 15-minute response time. The G-117a (Internet) only allows users to add/edit individual Contact Officials. The annual response total for the new Form G-117a (Internet) reflect that some updates previously handled through a single paper G-117a will require the user to make multiple submissions through the new online option. The lower 5-minute response time for the G-117a (Internet) reflects that existing information will be prefilled onto the online screens and that only a single individual's contact information will be provided per response. The total burden change is -2 hours.
16. Time schedule for data collection and publication - N.A.
17. Request not 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. We provided OMB with a consolidated project timeline.  
  
Given that the form in this collection is seldom revised; the costs associated with redrafting, reprinting, and distributing forms 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 Certification Statement – N.A.