

Justification
Vocational Report
 RRB Form G-251

1. Circumstances of information collection - Section 2 of the Railroad Retirement Act (RRA) (45 U.S.C. 231a) 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.

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 RRB information collection. Form G-251 is similar to Form SSA-3369-BK (OMB Control Number 0960-0578).
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 41994 of the June 28, 2023, Federal Register. No comments or requests for additional information were received.
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 <https://www.rrb.gov/sites/default/files/2017-06/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

Proposed Burden

Form Number	Annual Responses	Time (Minutes) ^{1/}	Burden (Hours)
G-251 (with assistance)	2,866	40	1,911
G-251 (without assistance)	136	50	113
Total	3,002		2,024

^{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.

	Responses	Hours
Total Burden Change	-2,998	-2,021
Adjustment	-2,998	-2,021

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 - The proposed burden information below is based on data for from 2020, 2021, and 2022. The data reveals that there has been a smaller number of Form G-251's collected by the RRB for the last three calendar years. In addition, we have improved our application tracking process to accurately account for all applications. 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. The burden amounts for Form G-251 have changed because the RRB experienced a decrease in the amount of RRA Disability Annuity applicants.
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 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 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 - None