

**Justification
Job Information Report
RRB Form G-251A**

1. Circumstances of information collection - The Railroad Retirement Act (RRA) was amended in 1946 to include Section 2(a)(1)(iv) (45 U.S.C. 231a) which established occupational disabilities for career railroad employees. Section 2(a)(2) of the RRA calls for railroad labor and management to establish and maintain standards that would permanently disqualify an employee from work in the railroad industry. In July of 1997, as a result of a cooperative effort between railroad labor and railroad management, the Railroad Retirement Board (RRB) adopted recommendations for new standards for the adjudication of occupational disabilities under the RRA. As part of these standards, the RRB requests job information used to determine an applicant's eligibility for an occupational disability from both railroad employers and railroad employees. Previously, the RRB formally requested job information from only the railroad employee, although railroad management has always had the opportunity to submit job information. The job information received from the railroad employer and the railroad employee is compared, reconciled if needed, and then used in the occupational disability determination process. The process of obtaining information from railroad employers to be used in determining an applicant's eligibility to an occupational disability is outlined in RRB regulation 20 CFR 220.13(b)(2)(iv)(E).

2. Purposes of collecting/consequences of not collecting the information - To determine entitlement to an occupational disability, the RRB currently determines if an employee is precluded from performing the full range of duties of his or her regular railroad occupation. This is accomplished by comparing the restrictions an impairment(s) causes against an employee's ability to perform his/her normal duties. To collect information needed 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 (OMB 3220-0141), to obtain this information from the employee applicant.

Note: 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.

The RRB currently uses Form G-251A to secure job information from the railroad employer. Details regarding the purpose and use of the form follows.

Form G-251A, Railroad Job Information, is released to an employer via transmittal letter RL-251A, when one of their employees files an application for an occupational disability, and requests the railroad employer provide information regarding whether the employee has been medically disqualified from their railroad occupation; a summary of the employee's duties; the machinery, tools and equipment used by the employee; the environmental conditions under which the employee performs their duties; all sensory requirements (vision, hearing, speech) needed to perform the employee's duties; the physical actions and amount of time (frequency) allotted for those actions that may be required by the employee to perform their duties during a typical work day; any permanent working accommodations an employer may have made due to the employee's disability; as well as any other relevant information the employer may choose to include.

The RRB requests the pertinent job information from employers, their responses are not required, but are voluntary. Completing the report gives them the opportunity to comment on their employee's actual duties. The employer is given 30 days from the date on the RL-251A transmittal letter to respond. If the job information is received timely, it is compared to the job information provided by the employee on Form G-251. Any material differences are resolved by the RRB disability examiner. Once resolved, the information is compared to the restrictions caused by the medical impairment. If the restrictions prohibit the performance of the regular railroad occupation, the claimant is found occupationally disabled.

After the report is completed, the employer signs and dates the report's Certification Section, and returns the completed report to RRB Headquarters.

The employee's identifying information is provided at the top of the form is completed by the RRB before the form is released to the employer for completion. Completion instructions and the Paperwork Reduction Act and Privacy Act Notices are found on the form.

The RRB proposes no changes to Form G-251A.

3. Planned use of improved information technology or technical/legal impediments to further burden reduction – This information collection does not allow for electronic submission as described in the Government Paperwork Elimination Act (GPEA). Our initial on-line format to utilize the RRB's Employer Reporting System (ERS) for internet version Form G-251A in 2018 is currently on hold due to budget constraints and contract issues. We will reevaluate the form in this collection after the completion of the RRB IT Modernization project.
4. Efforts to identify duplication - 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-251A.
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 the information collection. The notice to the public was published on page 2260 of the January 12, 2024, Federal Register.
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 burden for the collection is shown below.

Current Burden

Form Number	Annual Responses	Time (Minutes)1/	Burden (Hours)
G-251A	500	60	500

Proposed Burden

Form Number	Annual Responses	Time (Minutes)1/	Burden (Hours)
G-251A	436	60	436

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. Explanation for change in burden – The burden in completing these forms changed due to the RRB implementing enhancements in how it electronically tracks and stores completed forms, which allows the agency to provide more accurate burden estimates compared to prior OMB justification submittals.
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 forms in this collection are 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.