## Justification for Non-Substantive Changes for Form SSA- 671 Railroad Employment Questionnaire 20 CFR 404.1401- 404.1408 OMB No. 0960-0078

## **Background**

As part of the IT Modernization project, the Social Security Administration (SSA) created the Consolidated Claims Experience (CCE) System which will serve as a new collection tool for different Information Collections (ICs) for Title II benefits. The Social Security Administration (SSA) needs specific information to coordinate benefit distribution with the Railroad Retirement Board (RRB). Section 205(o) of the Social Security Act (Act) provides the criteria for use of railroad compensation to determine Social Security benefit entitlement. Section 20 CFR 404.1401 of the Code of Federal Regulations describes the relationship between the Act and the Railroad Retirement Act, and the coordination of benefits provided to railroad workers, their dependents, and survivors. Section 20 CFR 404.1406-404.1408 of the Code of Federal Regulations describes the circumstances under which SSA may pay Social Security benefits to a railroad employee, and when SSA can consider railroad industry wages for our own purposes.

## **Revision to the SSA-671:**

• **Change #1:** We are adding CCE as a new collection tool to collect the information electronically and during the retirement interview process.

<u>Justification #1:</u> Adding this new collection tool allows technicians to collect and store the information electronically instead of using the current paper modality.

SSA will implement the changes to this IC upon OMB approval.

These updates do not affect the reported public burden as we are collecting the same data reported in already approved Information Collections (ICs).