

Justification
Statement Regarding Contributions and Support of Children
 RRB Form G-139

1. Circumstances of information collection – The RRB collects financial data needed to determine one-half support for step-children, adopted children, grandchildren, step-grandchildren, equitably adopted children, and in limited situations, the employee's natural child when dependency on the employee is claimed by an employee, spouse, young parent, or child. When one-half support is claimed by an employee, it is for the purpose of increasing the overall minimum provisions on the basis of the presence of a dependent child. Section 2(d)(4) of the Railroad Retirement Act (45 U.S.C. 231a), provides, in part, that a child is deemed dependent on a parent employee if the conditions set forth in Section 202(d)(3), (4), or (9) of the Social Security Act are met.

If the child is a stepchild, Section 202(d)(4) of the Social Security Act, as amended by Public Law 104-121, requires that one-half of the support the child receives is from the stepparent. If one-half dependency is met, then the child is considered a dependent of the stepparent. This dependency impacts the entitlement of: 1) a spouse of an employee whose entitlement is based upon having a stepchild of the employee in care; 2) survivor of an employee whose entitlement is based upon having a stepchild of the employee in care; or 3) an individual seeking a child's annuity as a stepchild of an employee.

The eligibility for increasing an employee or spouse annuity is based on the child receiving one-half support from the employee as long as the child is a dependent child (20 CFR 222.50), the employee's natural child in limited situations (20 CFR 222.51), an adopted child (20 CFR 222.53), a stepchild (20 CFR 222.55), a grandchild or step-grandchild (20 CFR 222.56), or an equitably adopted child (20 CFR 222.57).

2. Purposes of collecting/consequences of not collecting the information - **Form G-139, Statement Regarding Contributions and Support of Children**, is used to determine if an applicant is entitled to a child's annuity based on actual dependency. The RRB solicits financial information regarding the child's means of support and a comparison is made between the amount of support received from the railroad employee and the amount received from other sources.

The RRB proposes minor editorial changes to Form G-139 to change the example dates under Section 1 “General Instructions” to January 1, 2024.

3. Planned use of improved information technology or technical/legal impediments to further burden reduction - None planned at this time due to low volume of forms used. We will reevaluate after the completion of the RRB IT Modernization Project.
4. Efforts to identify duplication - Form G-139 is similar to Form SSA-783 (OMB 0960-0020). This information collection does not duplicate any other RRB information collection.
5. Small business respondents - N.A.
6. Consequences of less frequent collection - Not applicable as the information is requested 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 107181 of the December 31, 2024, Federal Register. No comments or requests for additional information were received.
9. Payments or gifts to respondents – None
10. Confidentiality - Privacy Act System 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 estimated annual burden for the collection is unchanged.

Current Burden

Form Number	Annual Responses	Time (Minutes)	Burden (Hours)
G-139	500	60	500
Total	500		500

Proposed Burden

Form Number	Annual Responses	Time (Minutes) ^{1/}	Burden (Hours)
G-139	400	60	400
Total	400		400

^{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	<u>400</u>	<u>60</u>
Adjustment	100	0

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 - While conducting a review of the number of responses received between 2020 – 2023 and the enhancements made in how the RRB electronically tracks and stores completed forms, it was determined the number of responds decreased to 400. The decreased more accurately reflects the current burden.
16. Time schedule for 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. Modernization is still in progress and the agency hired a new CIO on November 4, 2024 who will be briefed on overall project status and updates to 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 - None