

Justification  
**Request to Non-Railroad Employer for  
 Information About Annuitant's Work and Earnings**  
 RRB Form RL-231-F

1. Circumstances of the collection - Under Section 2 of the Railroad Retirement Act (RRA) (45 U.S.C. 231a), a railroad employee's retirement annuity or an annuity paid to the spouse of a railroad employee is subject to work deductions in the Tier II component of the annuity and any employee supplemental annuity for any month in which the annuitant works for a Last Pre-Retirement Non-Railroad Employer (LPE). The LPE is the last person, company, or institution, other than a railroad employer, that employed an employee or spouse annuitant. Since a divorced spouse is not entitled to a Tier II benefit, Last Pre-Retirement Non-Railroad Employment does not affect a divorced spouse annuity.

The employee, spouse, or divorced spouse Tier I annuity benefit is subject to work deductions under Section 2(f)(1) of the RRA (45 U.S.C. 231a) for earnings from any non-railroad employer over the annual exempt amount.

The regulations pertaining to non-payment of annuities by reason of work and Last Pre-Retirement Non-Railroad Employment are contained in 20 CFR 230.1 and 230.2.

2. Purposes of collecting/consequences of not collecting the information - **Form RL-231-F, Request to Non-Railroad Employer for Information About Annuitant's Work and Earnings**, is used by the RRB to obtain information needed to determine if a work deduction should be applied because an annuitant worked in non-railroad employment after the annuity beginning date. Form RL-231-F is mailed to an LPE by an RRB office when the RRB receives notice from the Social Security Administration (SSA) that an employee or spouse annuitant has been credited by an LPE with wages after retirement and the earnings were not reported to the RRB by the annuitant on Form G-19L, *Annual Earnings Questionnaire* (OMB No. 3220-0179). Form RL-231-F is also used when information supplied by the annuitant on Form G-19L needs to be supplemented for work deduction information.

Prior to releasing the RL-231-F to the LPE, the RRB office enters, on the first page, identifying information about the annuitant and the year or years for which the work and/or earnings information is being requested. On the second page, the RRB checks the appropriate boxes (1-4) to request the employment and earnings information needed to determine the LPE. If box 3 is checked by the RRB, a date is also entered for the employer to use as the starting date for the earnings information needed. The employer returns the completed form to the RRB office in the pre-addressed envelope provided for that purpose.

**RRB proposes no changes to Form RL-231-F.**

3. Planned use of improved information technology or technical/legal impediments to further burden reduction - Not cost effective due to low volume. Due to agency technology limitations, this information collection does not allow for electronic submission as described in the Government Paperwork Elimination Act (GPEA). However, we will reevaluate electronic signatures after the completion of our IT Modernization project.
4. Efforts to identify duplication - To our knowledge, the LPE provision is unique to the RRB

and there is no comparable SSA form, and the information collection does not duplicate any other RRB information collection.

5. Small business respondents - N.A.
6. Consequences of less frequent collection - Not applicable since the information is requested only once for a report requiring further development of non-railroad earnings in excess of the annual exempt amount earned by an RRB annuitant who had non-railroad employment prior to retirement.
7. Special circumstances - N.A.
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 75000 of the September 13, 2024, Federal Register. No comments or requests for additional information were received.
9. Payments or gifts to respondents - N.A.
10. Confidentiality - Privacy Act System of Records, RRB-22, Railroad Retirement, Survivor and Pension Benefits 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 information collection is shown below.

**Current Burden**

Form Number	Annual Responses	Time (Minutes) <sup>1/</sup>	Burden (Hours)
RL-231-F	300	30	150
Total	300		150

<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.

13. Estimated annual cost to respondents or record keepers - N.A
14. Estimate of cost to Federal Government - N.A.
15. Explanations for change in burden – N.A.
16. Time schedule for data collection and publication - The results of this collection will not be published.
17. Requests 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 21<sup>st</sup> Century using multiple contractor services to improve mission performance, expand service capabilities, and strengthen cybersecurity and modernization is still in progress. The RRB hired a new CIO on November 4, 2024 who will be briefed the modernization initiative status and if requested, the RRB will provide OMB with any updates to the 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 - None