

Justification
Student Beneficiary Monitoring
 RRB Forms G-315, G-315A, and G-315A.1

1. Circumstances of information collection - Under the provisions of the Railroad Retirement Act (RRA), there are two types of benefit payments that are based on the status of a child being in full-time elementary or secondary school attendance at age 18-19:

- a survivor child's annuity benefit under Section 2(d)(1)(iii) (45 U.S.C. 231a) and
- an increase in the employee retirement annuity under the Special Guaranty computation as prescribed in Section 3(f)(2) (45 U.S.C. 231b) and 20 CFR 229.

The survivor student annuity is usually paid by direct deposit to a financial institution either into the student's checking or savings account or into a joint bank account with a parent.

The requirements for eligibility as a student are prescribed in 20 CFR 216.74, and include students in independent study and home schooling. The evidence to obtain benefits based on full-time elementary or high school attendance at an educational institution is prescribed in 20 CFR 219.54 and 219.55.

In survivor cases, Form AA-19, Application for Child's Annuity (OMB No.3220-0030), is required if the student is age 18-19 at initial entitlement. When the child is under age 18 at initial entitlement, Form AA-19 is filed on behalf of the child, for a minor child's annuity, and protects the child's rights to student benefits at attainment of age 18, provided there is no break in entitlement between the month the child attains age 18 and the month the child becomes entitled as a full-time student. A new Form AA-19 is not required at attainment of age 18.

2. Purposes of collecting the information - For the Railroad Retirement Board (RRB), to satisfy itself that a child is entitled to student benefits, the RRB requires evidence of full-time school attendance. Such evidence is to include a signed statement from the child that s(he) is attending full-time elementary or secondary school, and is not being paid by an employer to attend school, and either:

- a statement from the school registrar verifying that the child is attending school full-time, or
- when applicable, copies of the documentation approving the home schooling of the child at the elementary or secondary school level.

The forms used by the RRB to develop the evidence needed as proof of full-time elementary or secondary school attendance follow.

RRB Form G-315, Student Questionnaire, is used to obtain the information needed for full-time elementary or secondary school attendance (a) when the student is age 18-19 at initial entitlement to the survivor annuity, (b) when the child annuitant attains age 18 and qualifies as a full-time student, and (c) for student monitoring. For student monitoring, Form G-315 also obtains information on a student's marital status, social security benefits, and employment. When the G-315 is mailed by an RRB field office to the student or the representative payee, the field office enters the identifying information in Section A, Items 1-3, and the title of the school certifier in Section B. The identifying information and title of the school certifier are also entered on the G-315's transmittal Form RL-315, Cover Letter to

Form G-315 before both forms are released. After completing the remainder of the G-315, the student or representative payee obtains school verification, in Section B, of the information provided on the form and returns the form to the RRB field office in the pre-addressed return envelope provided for such purpose.

Information Booklet G-316, Railroad Retirement Benefits for Students Age 18-19 and In Elementary or Secondary School, is enclosed with Form G-315 at initial entitlement as a student. The booklet is also available at any RRB field office and at www.rrb.gov.

The RRB proposes no changes to Form G-315.

RRB Form G-315A, Statement of School Official, is used to obtain verification from a school of a student's full-time attendance, when a student fails to return a monitoring Form G-315. The field office enters its facsimile number, as well as the identifying information on the accompanying Form RL-315A, Cover Letter to Form G-315A, and in Section A, Items 1-7 of Form G-315A, before the forms are released. The RRB information entered is based on the full-time attendance information provided by the student on a previous monitoring questionnaire. After the G-315A is completed it, along with Form RL-315A, is returned to the field office either by facsimile or by mail in the envelope provided for that purpose.

The RRB proposes no changes to Form G-315A.

RRB Form G-315A.1, School Official's Notice of Cessation of Full-Time School Attendance, is released by the RRB field office to a student's school after the completed Form G-315 or G-320, Student Questionnaire for Special Guaranty Computation (OMB 3220-0083), is returned by the student. The field office enters their facsimile number as well as the identifying information and the title of the school certifier on both the G-315A.1 and its accompanying transmittal Form RL-315A.1, Cover Letter to Form G-315A.1, before both forms are released. The school retains Form G-315A.1 for future use in notifying the RRB when an event occurs that causes full-time attendance to end, which makes the student ineligible for future benefits based upon full-time school status. When/if Form G-315A.1 is returned, it is either faxed to the number the RRB provided or is mailed.

The RRB proposes no changes to Form G-315A.1.

3. Planned use of improved information technology or technical/legal impediments to further burden reduction – On-line completion is 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, this information collection does not duplicate any other RRB information collection and no other agency other than SSA uses a form similar to Form G-315, Form G-315A, and Form G-315A.1 as follows:
 - Form G-315 is similar to the Student's Statement Regarding School Attendance on page 2 of the Social Security Administration's (SSA) Form SSA-1372-BK, Advance Notice of Termination of Child's Benefits (OMB No. 0960-0105). However, the RRB does not release Form G-315 to all children attaining age 18. The student must contact the RRB field office and request it. To follow Social Security by releasing a form in advance to all children attaining age 18, would require additional hours to track and maintain.

When used for student monitoring, Form G-315 is similar to the SSA-1383, Student Reporting Form (OMB No. 0960-0088). Though SSA instructs the student to return the form only when there is a change to be reported and does not send out any additional monitoring forms during the school year, the RRB sends out the Form G-315 for survivor student monitoring in September, March, and June, or if earlier, at attainment of age 19, and requires the student to return all of the monitoring forms.

The RRB would have to change the current monitoring periods if the form is received only when there is a change.

- Form G-315A is similar to the Certification by School Official, on page 3 and similar to the Notice of Cessation of Full-time School Attendance on page 4 of SSA's Form SSA-1372-BK, Advance Notice of Termination of Child's Benefits (OMB No. 0960-0105).

SSA's forms request the SS claim number, which differs from the RRB's claim number. SSA captures information on the school's operating basis, i.e. yearly/quarterly, as well as previous schools attended. RRB captures the number of hours a student is enrolled in the current school only.

- Form G-315A.1 is similar to the Notice of Cessation of Full-time School Attendance, on page 4, of SSA's Form SSA-1372-BK, Advance Notice of Termination of Child's Benefits (OMB No. 0960-0105).

5. Small business respondents - N.A.
6. Consequences of less frequent collection - Forms G-315, G-315A, and G-315A.1 provide current information about individuals receiving benefits under the RRA based on full-time school attendance. Less than current information would adversely affect the RRB's determinations concerning a beneficiary's continued eligibility for benefits and could result in benefit overpayments by the RRB.
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 the information collection. The notice to the public was published on page 75001 of the September 13, 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 Pension 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 this collection is shown below. There are no changes.

Current Burden

Form Number	Annual Responses	Time (Minutes)1/	Burden (Hours)
G-315	860	15	215
G-315A	20	3	1
G-315A.1	20	2	1
Total	900		217

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. Estimate of annual cost to respondents or record keepers - N.A.
14. Estimate of cost to Federal Government - N.A.
15. Explanation for changes in burden - N.A.
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 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 the Certification Statement - None