

Justification
**Annual Earnings Questionnaire for Annuitants
 in Last Pre-Retirement Non-Railroad Employment**
 RRB Form G-19L

1. Circumstances of information collection - Under Section 2(e)(3) of the Railroad Retirement Act (RRA) (45 U.S.C. 231a), an annuity is not payable for any month in which the beneficiary works for a railroad. In addition, it is reduced for any month in which the beneficiary works for an employer other than a railroad employer and earns more than a prescribed amount. For calendar year 2024, the exempt amounts are \$22,320 for annuitants under full retirement age (FRA) and \$59,520 for annuitants who have attained full retirement age. This limit applies only to earnings for months prior to the month in which FRA is attained. There is no restriction on earnings for annuitants over FRA.

Under the 1988 amendments to the RRA (P.L. 100-647, the Technical and Miscellaneous Revenue Act of 1988), the Tier II portion of the regular annuity and any supplemental annuity must be reduced by one dollar for each two dollars of Last Pre-Retirement Non-Railroad Employment (LPE) earnings for each month of such service, except that the reduction cannot exceed 50% of the Tier II and supplemental annuity amounts for the month to which such deductions apply. Prior to these amendments, an annuity was not payable for any month in which an annuitant had LPE earnings. Last Pre-Retirement Non-Railroad Employment generally refers to the annuitant's last employment with a non-railroad person, company, or institution prior to retirement, which was performed at the same time as railroad employment or after the annuitant stopped railroad employment.

The provisions relating to the reduction or non-payment of annuities by reason of work are prescribed in 20 CFR 230.1 and 230.2.

2. Purposes of collecting/consequences of not collecting the information - **Form G-19L, Annual Earnings Questionnaire**, is used by the Railroad Retirement Board (RRB) to obtain the LPE earnings information needed to determine possible reductions in an annuity because of LPE earnings.

The form is used as part of the RRB's annual earnings monitoring program to determine whether the annuitant was paid correct annuity amounts during the last calendar year and if adjustments are required for the current year because of an annuitant's LPE earnings, or earnings in excess of the annual exempt amount.

Page 1 of the form explains to the annuitant the circumstances surrounding the release of Form G-19L.

Page 2 of the form is comprised of three parts to be completed as follows:

- Part A is completed by the annuitant who has earnings from LPE in the past calendar year and/or in the current calendar year.
- Part B is completed by the annuitant who has earnings from self-employment in the past calendar year and/or in the current calendar year.
- Part C is completed by the annuitant who has earnings from other than LPE or self-employment in the past calendar year and/or in the current calendar year.

In the majority of cases, Form G-19L is mailed to the respondent. The annuitant's name and other identifying information are pre-filled on the G-19L before release. The RRB also encloses Form G-77a, *How Work Affects Your Railroad Retirement Benefits*, along with the G-19L. The annuitant returns the completed Form G-19L to the RRB in the envelope provided for that purpose.

The RRB proposes minor changes to update the office hours on Form G-19L.

3. Planned use of improved information technology or technical/ legal impediments to further burden reduction - The RRB has determined that placing this form on the Internet is not practicable because this form is initiated by the RRB with pre-filled data and the burden is at a marginal level. 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, no other agency uses a similar form, and this information collection does not duplicate any other RRB information collection.
5. Small business respondents - N.A.
6. Consequences of less frequent collections - Obtaining the employment and earnings information less frequently would affect the accurate payment of annuities under the RRA.
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 75002 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 - There are no questions of a sensitive nature.
12. Estimate of respondent burden - The estimated respondent burden for the collection is shown below.

Current Burden

Form Number	Annual Responses	Time (Minutes) ^{1/}	Burden (Hours)
G-19L	300	15	75
Total	300		75

^{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 burden to respondents or record keepers - N.A.
14. Estimate of cost to the Federal Government - N.A.
15. Explanation for change in burden - N.A.
16. Time schedule for data collection and publication - The results of this collection will not be published.
17. Request to not 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 Certification Statement - None