

Justification
Citizen-Centric Online Self-Services (CCOSS) Authorization
Forms COA-1 and DDC-1

1. Circumstances of information collection – Section 7(b)(6) of the Railroad Retirement Act (RRA) (45 U.S.C.231f) and section 12(l) of the Railroad Unemployment Insurance Act (45 U.S.C. 362(l)) permits annuitants, beneficiaries, and claimants to submit direct deposit and mailing address authorizations to facilitate the Railroad Retirement Board (RRB) verification and certification of benefit payments electronically.

The procedures pertaining to the RRB's authority to collect direct deposit and mailing address information to carry out RRA and RUIA benefit payment are contained in 20 CFR 321 and 20 CFR 325.

2. Purposes of collecting/consequences of not collecting the information – In meeting its primary mission for the payment of benefits under the RRA and RUIA, the RRB requires correct address and direct deposit information. All RRA and RUIA initial address and direct deposit information is currently received during the benefit application process. The applicant is required to submit documentary evidence in support of their application. Subsequently, the RRB proposes to use the following forms to obtain the information needed to determine the validity of the banking information and postal addresses for annuitants, beneficiaries, and claimants.

Form COA-1, Change of Address (Internet), is completed on MyRRB (RRB.gov) by a railroad annuitant, beneficiary, or claimant when they need to change their mailing address they have on file at the RRB after they have gone through the identify verification using Login.gov. To initiate a change to mailing address, an annuitant, beneficiary, or claimant must establish an account on Login.gov to authenticate the user. Once the Login.gov account has been established, the user can access all RRB Internet-based services through the rrb.gov/myRRB web portal.

When an RRB user enters a change of address on the rrb.gov/myRRB web portal, the Form COA-1 form entry will be matched with the USPS address validation to ensure correct address information. Railroad annuitants, beneficiaries, or claimants will be able to update their mailing address as needed, including retirees who have multiple residences and live temporarily at each residence for part of the year and request two or more address changes annually. The RRB will also save resources normally committed to manual processing.

The RRB proposes a new Form COA-1.

Form DDC-1, Direct Deposit Change (Internet), is completed on myRRB (RRB.gov) by a railroad annuitant, beneficiary, or claimant when they need to change their Electronic Funds Transfer (EFT) bank account they have on file at the RRB after they have gone through the identify verification using Login.gov.

To initiate a direct deposit change, an annuitant, beneficiary, or claimant must establish an account on Login.gov to authenticate the user. Once the Login.gov account has been established, the user can access all RRB Internet-based services through the rrb.gov/myRRB web portal.

The information collected on the Form DDC-1 direct deposit screen reflects the direct deposit information collected from the manual versions of the RRA and RUIA application forms and Standard Form 1199A, Direct Deposit Sign-up Form. Collecting direct deposit information allows the payment of benefits to be deposited into the myRRB users' financial institution account. The key information needed to route benefit payments to the users account at the financial institution are the users account number and the financial institution's routing transit number. This information is used by Treasury, the Federal Reserve System, and the financial institution to route payments to the correct payee's account. The direct deposit screen will provide the RRB user with immediate notification of errors with the entry, alerting the user of incorrect information, and help eliminate errors in payments.

The RRB proposes a new Form DDC-1

3. Planned use of technology or technical/legal impediments to further burden reduction – None. As required by the Government Paperwork Elimination Act (GPEA), federal agencies must provide the public with the option to submit, maintain and transact business electronically.

Consistent with the goals of the GPEA, the RRB propose to offer internet versions of Forms COA-1 and DDC-1 so the public can request a change of address and direct deposit authorization via CCSS on rrb.gov/myRRB.

4. Efforts to identify duplication – To our knowledge, the Department of Treasury use Standard Form 1199A, Direct Deposit Sign-up Form (OMB No. 1530-0006) to collect direct deposit information and other federal agencies use electronic direct deposit and change of mailing address forms similar to proposed Forms DDC-1 and COA-1 and this information collection does not duplicate any other RRB information collection.
5. Small business respondents – N/A.
6. Consequences of less frequent collections – None.
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 24167 of the June 6, 2025, Federal Register. No requests for further information or comments were received.
9. Payments or gifts to respondents – None.
10. Confidentiality – Privacy Act System of Records, RRB-21 Railroad Unemployment and Sickness Insurance Benefit System and 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>.

Note: Created to ICs in ROCIS.gov to account for RRB Privacy Act System of Records RRB-21 and RRB-22.

11. Sensitive questions – N/A.
12. Estimate of respondent burden – The proposed estimated annual burden for this collection is as follows:

Proposed Burden

Form Number	Annual Responses	Time (Minutes)	Burden (Hours)
COA-1	30,395	8	4,025
DDC-1	37,595	6	3,760
Total	67,990		7,785

13. Estimate of annual cost burden 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 collections and publications – The results of this collection will not be published.
17. Request not to display OMB expiration date – The RRB is still involved in an extensive multi-year IT Modernization Initiative that began in 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. Citizen-Centric Online Self-Services (CCOSS) is a product of the IT Modernization Initiative to improve the rrb.gov/myrrb.gov environment to expand service capabilities. The RRB hired a new CIO on November 4, 2024, who is involved with streamlining modernization initiatives and the RRB will provide OMB with any updates to the consolidated project timeline.

Given the reduction in FTE and contractor staff; budget cuts; the effort to start keeping the appropriate OMB expiration date in place as we do not currently maintain an OMB expiration date on none of our forms; and our desire to reevaluate this 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