

Justification
Employer's Deemed Service Month Questionnaire
RRB Form GL-99

1. Circumstances of information collection – Under Section 3(h) of the Railroad Retirement Act (RRA) (45 U.S.C. 231b), service performed for a covered railroad employer or as an employee representative is creditable toward an annuity under the RRA. Such annuities are based on an employee's earnings credits and months of service. Section 3(i) of the Act, as amended by the Railroad Retirement Solvency Act of 1983 (P.L. 98-76) provides that after 1984, the Railroad Retirement Board (RRB) under certain circumstances, may deem additional months of service for an employee who has worked less than 12 months in a calendar year and who also satisfies certain eligibility requirements, including the existence of an employment relation between the employee and his or her employer.

The procedures pertaining to the deeming of additional months of service are contained in the RRB's regulations 20 CFR 210, Creditable Railroad Service.

2. Purposes of collecting/consequences of not collecting the information - The RRB uses Form GL-99, Employer's Deemed Service Months Questionnaire, to obtain needed information from railroad employers to determine whether an employee had an employment relationship with a covered railroad employer or was an employee representative during a month not worked.

Form GL-99 is generated and released by the RRB when an employer reports less than 12 months of service, additional employment relationship information is needed, and:

- there are six or more potential deemed months; or
- the employee has more than one employer in the calendar year; or
- the employee has no service months reported in the following calendar year.

The RRB proposes no change to Form GL-99.

3. Planned use of improved information technology or technical/legal impediments to further burden reduction – 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 form similar to Form GL-99 and 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 since the deeming actions are part of the annual update of railroad employees' service and compensation records.
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 this information collection. The notice to the public was published on page 52715 of the November 21, 2025, in the Federal Register. No comments or requests for additional information were received from the public.
9. Payments or Gifts to respondents – N.A.
10. Confidentiality – Privacy Act System of Records, RRB-5, Master File of Railroad Employees' Creditable Compensation. 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 and proposed estimated burdens for this collection are as follows:

Current Burden

Form Number	Annual Responses	Time (Minutes)1/	Burden (Hours)
GL-99	2,000	2	67

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 need 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 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 the Certification Statement – None