

Justification
Vocational Report
 RRB Form G-251

1. Circumstances of information collection - Section 2 of the Railroad Retirement Act (RRA) (45 U.S.C. 231a) provides for payment of disability annuities to qualified employees and widow(er)s. The establishment of permanent disability for work in the applicant's "regular occupation" or for work in any regular employment is prescribed in 20 CFR 220.12 and 220.13, respectively.
2. Purposes of collecting/consequences of not collecting the information - To enable the Railroad Retirement Board (RRB) to determine the effect of a disability on an applicant's ability to work, the RRB needs the applicant's work history. The RRB utilizes Form G-251, Vocational Report, to obtain this information.

Form G-251 is provided to all applicants for employee disability annuities and to those applicants for a widow(er)'s disability annuity who indicate that they have been employed at some time. Form G-251 is designed for use with the RRB's disability benefit application forms.

The RRB proposes the following changes to Form G-251:

- In Section 3, item 7, added "including any self-employment" at the end of the first sentence, added "NOTE 3: If you are listing any self-employment or work for a business that you own, then also complete form AA-4, *Self-Employment and Substantial Service Questionnaire*." and added "Name of Employer" column.
- In Section 3, items 12, 16 and 20, added "the interactions you have with coworkers or the public" and "vision requirements" to the list of essential duties that may be described of the position or occupation named in Item's 7a, 7b and 7c and made other minor editorial changes to make questions simpler and clearer.
- In Section 3, items 14b, 18b and 22b, replaced "Descriptive Comments" with "Description of Physical Activity" in the 2nd sentence and added Description of Physical Activity" column.
- In Section 3, items 14b, 18b and 22b, added "3Constantly (2/3 to 3/3)" to the Amount of Time column.
- In Section 3, items 14b(4), 18b(4) and 22b(4), replaced "Crouching/Squatting/Stooping" with "Crouching/Squatting".
- In Section 3, items 14b(5), 18b(5) and 22b(6), added "Stooping" and renumbered subsequent physical activity action options.
- In Section 3, added "3Constantly means occurring over two-thirds (approx. 5 hours) of an 8-hour workday; cumulative, not continuous." for footnotes related to the Amount of Time column for items 14b, 18b and 22b.
- In Paperwork Reduction Act/Privacy Act Notices, changed last sentence to

“If you wish, send comments regarding the accuracy of our estimate, or any other aspect of this form, including suggestions for reducing completion time, to: Railroad Retirement Board, ATTN: Bureau of Information Services/Policy & Compliance, 844 N. Rush Street., Chicago, IL 60611-1275.”

3. Planned use of improved information technology or technical/legal impediments to further burden reduction - Due to a process that requires the RRB to initiate Form G-251 by conducting a face-to-face interview with all applicants, it is not practical to implement an electronic form for annuitants to complete, this information collection does not allow for electronic submission as described in the Government Paperwork Elimination Act (GPEA).
4. Efforts to identify duplication – To our knowledge, Form G-251 is similar to Form SSA-3369-BK (OMB Control Number 0960-0578, 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 as the information is solicited only once.
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 44883 of July 17, 2026, Federal Register. No comments or requests for additional information were received.
9. Payments or gifts to respondents - N.A.
10. Confidentiality - Privacy Act Systems of Records 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>.
11. Sensitive questions - N.A.
12. Estimate of respondent burden - The current estimated burden for this collection is unchanged as follows.

Current Burden

Form Number	Annual Responses	Time (Minutes)	Burden (Hours)
G-251 (with assistance)	2,866	40	1,911
G-251 (without assistance)	136	50	113
Total	3,002		2,024

Proposed Burden

Form Number	Annual Responses	Time (Minutes) ^{1/}	Burden (Hours)
G-251 (with assistance)	2,561	40	1,707
G-251 (without assistance)	117	50	98
Total	2,678		1,805

^{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.

	Responses	Hours
Total Burden Change	<u>2,678</u>	<u>1,805</u>
Adjustment	-324	-219

13. Estimated annual cost to respondents or record keepers - N.A.
14. Estimate of cost to Federal Government - N.A.
15. Explanation for change in burden - The overall annual responses decreased by 324 from 3,002 to 2,678 and the overall burden hours decreased by 219 from 2,024 to 1,805 during 2023 – 2025 due a decreased in Form 215 applications; improved tracking of the application process to allows for more accurate account and estimate of application responses and a decrease in RRA Disability Annuity applicants. The decrease is an adjustment.
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 was briefed on the modernization initiative status and if requested, the RRB will provide OMB with any updates to the consolidated project timeline.

Given that the form in this collection is 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