

Justification

Designation of Contact Officials

RRB Form G-117a (Paper) and Form G-117a (Internet)

1. Circumstances of information collection - Section 7(b)(6) of the Railroad Retirement Act (RRA) (45 U.S.C.231) gives the Railroad Retirement Board (RRB) the authority to require railroad employers to furnish information and records that are necessary for the administration of the Act. Further, Section 9 of the RRA and Section 6 of the Railroad Unemployment Insurance Act (RUIA) requires railroad employers to file reports of compensation of employees. This information serves as the basis for calculating retirement, disability, and survivor awards as well as the payment of unemployment and sickness benefits.
2. Purposes of collecting/consequences of not collecting the information - Coordination between railroad employers and the RRB is essential for the RRB to properly administer the payment of benefits under the RRA and the RUIA. In order to enhance timely coordination activity, the RRB utilizes Form G-117a, Designation of Contact Officials.

Form G-117a (Paper), Designation of Contact Officials, is used by railroad employers to notify the RRB of the official designated to coordinate various functions under the RRA and the RUIA with agency staff. The form provides the RRB with the name, title, address, phone number, facsimile number, and E-mail address of the contact. Completion is voluntary.

The RRB proposes the following changes to Form G-117A:

- **Changed the layout of the form to accommodate remove the “Items/Contact Official and/or Descriptions” section in the form instructions and move each Contact Official section of the form as applicable.**
- **Added “(4) SUPPLEMENTAL ANNUITY” Designation of Contact Official.**
- **Added item “(7) SECTION 2(f) BILL PAYMENT – RUIA” Designation of Contact Official.**
- **Added “(9) SECTION 12(o) BILL PAYMENT – RUIA” Designation of Contact Official.**
- **Removed “(11) STREET ADDRESS”.**
- **Added “(14) VERIFICATION OF EMPLOYER GROUP HEALTH PLAN” Designation of Contact Official.**
- **Added “(15) CERTIFICATION”.**
- **Renumbered items to account added Contact Officials, as applicable.**
- **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.”**

Note: Updated form to address recent Office of Inspector General Audit

recommendation to create additional contact officials to delineate the RRB individuals/offices who need to be notified of potential liens and those who submit payments for established debts to be recorded in RRB records accordingly. The Certification field was added to the form to collect the telephone number of the certifying official in the event an RRB employee(s) need to contact the certifier to clarify information provided on the form.

Form G-117a (Internet), Designation of Contact Officials, is available to employers who request access to the form through the RRB's Employer Reporting System (ERS).

Access to ERS is granted only to employers and their designees who have completed Form BA-12, *Application for Employer Reporting Internet Access* (3220-0008), which provides information used by the RRB to evaluate, grant, and document the level of access requested (view only, data entry, or approval/submission rights).

The G-117a (Internet) consists of a series of screens that allows users to view the Contact Officials currently on file for the employer. Users will be able to edit and delete existing Contact Officials, as well as add new Contact Officials. The screen to edit and add Contact Officials collects essentially the same information as the approved paper Form G-117a. The internet version provides for the required notices and certifications, contains help messages to ensure users provide valid contact information, and prevents users from deleting Contact Officials without first providing a replacement.

The RRB proposes the following changes to Form G-117a (Internet):

- **Updated the Manage Contact Officials screen to added new contact official types to match Form G-117 (Paper).**
 - **Updated the New Contact Official and Edit Contact Official screens to add new contact official types in the Areas of Responsibility section to match Form G-117 (Paper).**
3. Planned use of improved information technology or technical/legal impediments to further burden reduction – Due to the launch of Form G-117a (Internet) on ERS and the RRB mandate to railroad employers to use electronic forms available through ERS and use of Form G-117a (paper) only for railroad employers who demonstrate to the RRB an undue burden or special situations where it is not possible to use the online form, the RRB is satisfying the electronic submission requirements as described in the Government Paperwork Elimination Act (GPEA).
 4. Efforts to identify duplication – To our knowledge, no other agency uses a form similar to Form G-117a, and this information collection does not duplicate any other RRB information collection.
 5. Small business respondents - N.A.
 6. Consequences of less frequent collection - Completion is voluntary.
 7. Special circumstances - N.A.
 8. 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 44884 of the July 17, 2026, Federal Register. No comments or requests for additional information were received.

9. Payments or gifts to respondents - None
10. Confidentiality - N.A.
11. Sensitive questions - N.A.
12. Estimate of respondent burden - The current and proposed burden for the collection is as follows.

Current Burden

Form Number	Annual Responses	Time (Minutes)	Burden (Hours)
G-117a (Paper)	25	15	6
G-117a (Internet)	200	5	17
Total	225		23

Proposed Burden

Form Number	Annual Responses	Time (Minutes)/1	Burden (Hours)
G-117a (Paper)	20	15	5
G-117a (Internet)	75	5	6
Total	95		11

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>95</u>	<u>11</u>
Adjustment	-130	-12

Note: Identified a miscalculation in proposed burden table for Form G-117a (Paper) burden hours and corrected it in the OMB Secondary Notice and justification.

13. Estimated annual cost to respondents or record keepers - N.A.
14. Estimated cost to Federal Government - N.A.
15. Explanation for change in burden – The overall annual responses decreased by 130 from 220

to 95 and the overall burden hours decreased by 12 from 21 to 11 during 2023 – 2025 due to a significantly lower estimate when the G-117a (Internet) was launched that mandated and anticipated more railroad employers use the online form. The decrease is an adjustment.

16. Time schedule for data collection and publication - N.A.
17. Request 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 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 – N.A.