

Supporting Statement
Applicant Background Survey, NARA Form 3035
OMB Control No. 3095-0045

A. JUSTIFICATION

1. **Circumstances Making the Collection of Information Necessary.** This data collection is needed to comply with Federal laws and regulations. 5 U.S.C Chapter 72 § 7201 establishes the anti-discrimination policy. Title VII of the Civil Rights Act of 1964, § 2000e-8 [§ 709], requires agencies to make and keep relevant records to identify unlawful employment practices. 29 C.F.R. § 1602 allows agencies to collect data to determine if there is any adverse impact on employment practices such as recruitment and selection. Copies of these statutes are attached.
2. **Purpose and Use of the Information.** The National Archives and Records Administration (NARA) Human Resources and Equal Employment Opportunity and Diversity Programs staff collect and use the information to assess the impact of NARA's recruitment processes on the hiring of minorities, women, and people with disabilities. We attach the Applicant Background Survey to job announcements that are distributed for public use. Employment applicants voluntarily complete the form and submit it with their application. Authorized NARA human resources officials enter data from the completed forms into an automated database separate from our personnel database. Once entered into the database, the information—which is no longer associated with the applicant by name—is analyzed to determine how effectively our recruiting practices reach all segments of the population, as required by Federal law. The form is being revised to: 1) simplify the instructions to applicants for completing the form, 2) update the list of recruitment sources to eliminate outdated sources, consolidate similar sources, and add new sources that reflect the trend towards internet recruiting, and 3) facilitate better collection of disability information.
3. **Use of Information Technology and Burden Reduction.** We rely on the Office of Personnel Management (OPM) system—USAJOBS—and our web site to advertise positions electronically. The Applicant Background Survey is provided as an electronic link from our vacancy announcements on USAJOBS and our web site, which reduces the burden for most applicants. The OPM system allows electronic submission of job applications, and NARA accepts applications electronically through this system.
4. **Efforts to Identify Duplication and Use of Similar Information.** Information about the racial or ethnic identity, gender, and disabilities of applicants for NARA jobs from outside the Federal government is not available elsewhere.
5. **Impact on Small Business or Other Small Entities.** This data collection does not affect small businesses or other small entities.

6. **Consequences of Collecting the Information Less Frequently.** If this data is not collected (since it is only collected once, to collect it less frequently would mean not collecting it at all), we cannot analyze the racial, ethnic, and disabilities composition of applicant pools. It has proven impossible to identify the reason for our under-representation without this information. We are not able to fully include all of America in our applicant pool without it.
7. **Special Circumstances Relating to the Guidelines of 5 CFR 1320.5.** There are no special circumstances.
8. **Comments in Response to the Federal Register Notice and Efforts to Consult Outside Agency.** We conducted a review of forms that are being used by other Government organizations for this purpose, so that our design would be informed by their best features. While the information requested is essentially similar on all the forms, the one used by the Department of Interior (DI-1935, OMB Control No. 1091-0001, expiration date – 04/30/2009) seemed best suited to our needs: sufficiently user-friendly and in compliance with OMB’s October 30, 1997 RNO code requirements. Our form mirrors that approved form.

A Request for Comments for the Proposed Collection using the NARA Form 3035 was posted in the *Federal Register* on December 28, 2006 (71 CFR 78225 and 78226) inviting comment on the use of the form. No comments were received.

9. **Explanation of Any Payment or Gift to respondents.** No payment or gifts will be provided to respondents.
10. **Assurance of Confidentiality Provided to Respondents.** There is a statement of the Privacy Act of 1974 (Public Law 93-589), the Public Burden Statement, and the Paperwork Reduction Act Statement. In addition, the “General Instructions” section of the form contains a “Plain English” assurance that the information is kept highly confidential and only shared with authorized NARA officials. This assurance specifically states that the results are used for statistical purposes only, that the information provided will in no way affect the candidate’s application or selection, and that none of the information provided is released to anyone who can affect the application.
11. **Justification for Sensitive Questions.** The form asks the respondent for their sex, ethnicity, race, and disability status. NARA will use this information to determine if our recruiting methods are reaching groups who are under-represented in our workforce. The form explains this to the respondent and states that providing the information is voluntary.
12. **Estimates of Hour Burden Including Annualized Hourly Costs.** In FY 2005, there were 8,098 applicants for a total of 425 applicant pools at NARA. It takes no more than 5 minutes to complete the Applicant Background Survey form. We received responses from 5,547 applicants during FY 05, a response rate of about 69 percent. The annual

hour burden is thus estimated at 460 hours (5,547 responses x 0.083 hours per form). The average grade of NARA employees is GS-7, so this would be the average grade of job vacancies and the approximate income of applicants for those vacancies. Therefore, the estimated cost of the average applicant's time is based on the GS-7 salary of \$36,671 per year. Assuming a work year of 2,087 work hours, an applicant's time is worth \$17.57 per hour ($\$36,671 \text{ year} / 2,087 \text{ work hours in a year}$), or \$1.46 per survey form ($\$17.57 \text{ per hour} \times .083 \text{ hours per form}$). The estimated total cost to all applicants to complete the form is thus \$8,158 (8,098 applicants x 0.69 response rate x \$1.46 per form).

13. Estimate of Other Total Annual Cost Burden to Respondents or Recordkeepers.

There is no other cost burden to respondents. Respondents are not required to keep records.

- 14. Annualized cost to the Federal Government.** We estimate that about 5,500 forms will be returned. It takes no more than 0.033 hours (2 minutes) to enter data from one form into the database. It will thus require a total of about 182 hours per year for data entry (5,500 forms x .033 hours per form entered). GS-3 level employees will usually enter the data. The cost of salary and benefits is \$14.90 per hour at this grade level. The data entry would thus cost \$1,281 each year ($\$14.90 \text{ per hour} \times 86 \text{ hours}$). The data will be reported by vacancy. We estimate posting about 425 vacancies annually. Each reported vacancy will require a quick review of no more than 2 minutes (.033 hour), or 14 hours in total (425 vacancies x .033 hours quick review), simply to determine if there is diversity in the applicant pool. The amount of subsequent in-depth analysis will depend on the data results and so is hard to anticipate. Our best estimate is that 20 percent of the vacancies will require an additional 10 minutes (.166 hour) each to analyze, for a total of 14 hours (425 vacancies x .2 in-depth review x .166 hours). This is a total of 28 hours of review (14 hours of quick review + 14 hours of analysis). The review and analysis will generally be done by GS-13 level employees, whose salary and benefits are worth \$48.90 per hour. The estimated total cost of report retrieval and analysis is thus \$1,369 per year ($\$48.90 \text{ per hour} \times 28 \text{ hours per year}$). This analysis will then lead to focused efforts to eliminate any identified barriers in the recruitment process, which will in turn result in savings in recruitment efficiency, neither of which is counted as a direct cost of this survey. Follow-up with the estimated 4,100 applicants who do not return the form with their application will take about 3 minutes per applicant or 205 hours (4,100 x 0.05 hours). The follow-up will be done by GS-3 level employees. The cost of salary and benefits is \$14.90 per hour at this grade level. The follow-up would thus cost \$3,055 each year ($\$14.90 \text{ per hour} \times 205 \text{ hours}$). The estimated annual cost of printing the forms is less than \$23 per year ($\$.045 \text{ per form} \times 500 \text{ copies per year}$). Existing computer equipment and software will be used. In most cases, the form will be at no cost to the Government because it is provided electronically by USAJOBS or our web site. The estimated total annual cost to the Federal government is no more than \$5,728 (\$1,281 data entry + \$1,369 analysis + \$3,055 for follow-up + \$23 printing).

15. **Explanation for Program Changes or Adjustments.** The cost per form per applicant and the estimated total annual cost to the Federal government are consistent with past figures. There has been no significant change.
16. **Plans for Tabulation and Publication and Project Time Schedule.** Statistical data from the submitted forms is compiled in NARA's Performance Measurement and Reporting System (PMRS) on an ongoing basis. PMRS is NARA's official source for statistical information and includes all of NARA's performance measures related to the Government Performance and Results Act (GPRA). Summary information relating to applicant diversity is subsequently extracted from the PMRS and published in our Annual Performance Report.
17. **Reason(s) Display of OMB Expiration Date is Inappropriate.** The expiration date for OMB approval of this information collection will be displayed on the form. We are not seeking an exemption to not display the expiration date of the OMB approval.
18. **Exceptions to Certification for Paperwork Reduction Act Submissions.** There are no exceptions to the certification statement identified in Item 19 of OMB Form 83-I, "Certification for Paperwork Reduction Act Submissions."

B. COLLECTION OF INFORMATION EMPLOYING STATISTICAL METHODS

1. **Respondent Universe and Sampling Methods.** The total respondent universe is 8,098 job applicants (see A.12. above), but the number of applicants for most individual vacancies is small, and the proportion of women and minorities of that number is frequently very small. There is no way to predict who will apply for individual vacancies, and thus no way to stratify the applicants. While the courts have recently started recognizing parametric statistics in comparisons of Agency occupations to relevant Civilian Labor Force occupations, both based on complete enumerations, the legal tradition surrounding the analysis of individual vacancies is non-parametric statistics from a census (complete enumeration) of applicants, such as percent. We have moved to a computer-supported tracking system (see B.3. below), so that we may provide more timely and certain follow-up for nonresponse.

2. Procedures for the Collection of Information.

Statistical methodology for stratification and sample selection.

The Applicant Background Survey will be provided as part of the package of documents for job application, through the electronic advertising in USAJOBS and our web. The survey will be sent individually to those who do not return it as part of their application package.

The respondent data is the only source of the demographics that would be used for stratification. The purpose of the Applicant Background Survey is to gather that information. It is not possible to do stratification prior to receipt of the survey data.

Estimation procedures; Degree of accuracy needed for the purpose described in the justification; Unusual problems requiring specialized sampling procedures.

We find that the response rates that we typically achieve are acceptable for our purposes. The response we typically achieve and expect to achieve in future exceeds the number needed for a sample size for a heterogeneous population that supports a 95% confidence level \pm 3% sampling error.

Any use of periodic (less frequent than annual) data collection cycles to reduce burden.

The data is collected only once, at the time of job application.

3. **Methods to Maximize Response Rates and Deal With Nonresponse.** The form is provided electronically by USAJOBS and on our web site as part of the NARA vacancy announcements, and in hard copy from our personnel office, so that applicants receive the form as a normal part of the application package. As applications are submitted to us, they are immediately checked to see if the Applicant Background Survey was included in the application package and, if not, a follow-up request is promptly sent. This allows for immediate follow-up.
4. **Test of Procedures or Methods to be Undertaken.** Our examination of the responses collected indicates that the methods we are using produce valid feedback.
5. **Individuals Consulted on Statistical Aspects and Individuals Collecting and/or Analyzing Data.** When NARA first designed our Applicant Background Survey form, we consulted Dr. Gary Machlis, Chief Social Scientist of the National Park Service (phone 202 208-5391). Dr. Machlis was consulted on the design of the DOI version of the form, the testing of the effectiveness of the form, and the statistical methods for reporting the results. The design and methods are compliant with the guidance in the relevant literature. The data will be received by the NARA Human Resources office (NAH). The summary results will be initially reviewed by that staff and then analyzed in depth by our Equal Employment Opportunity and Diversity Programs staff (NEEO). Specific questions should be addressed to Analisa Archer, NAH, at 301-837-3194, and Robert Jew or Allison Darnaby, NEEO, at 301-837-1550.