

## Supporting Statement for Paperwork Reduction Act Submission

### Standard Form (SF 15)

Under the provisions of the Paperwork Reduction Act of 1980 (title 44, U.S. Code, Chapter 35), the Office of Personnel Management (OPM) is submitting to the Office of Management and Budget (OMB) a request for the continued use of the SF 15, Application for 10-Point Veteran Preference, which gathers information to support applicant claims for veterans' preference.

#### **A. Justification for Standard Form 15**

1. Veterans' preference is established by the Veterans Preference Act of 1944, as amended, and is now codified in various provisions of title 5, United States Code (U.S.C.). By law, veterans who are disabled or who served on active duty in the Armed Forces during certain specific time periods or in military campaigns are entitled to preference over others in hiring from competitive lists of eligibles. Specifically, 5 U.S.C. 2108 and 3309 identify those persons eligible for 10-point veterans' preference. Consequently, a veteran must be informed of his or her rights and provided with a procedure for securing these rights.

2. OPM and agency examining offices use the information from the SF 15, including supporting documentation, to determine if the applicant for a Federal job is eligible for the type of 10-point preference he or she is claiming. Without this information, officials would not know how to adjudicate the claim, because there are seven different types of claims and required documentation varies accordingly. The submission of documents alone without the SF 15 would not satisfy this need.

The SF 15 is used to permanently document the veteran's claim in the veteran's Official Personnel Folder upon appointment. This is especially important in Reduction in Force (RIF) actions where veterans' preference comes into play with regard to retention and in certain types of appointment actions, such as Veterans Recruitment Appointments.

3. Electronic alternatives to the SF 15 would not be cost-effective because of the amount of information that is actually collected. The supporting documentation that must be submitted with the SF 15 provides most of the information agencies use to adjudicate veterans' preference. The information may come from the military, the Department of Veterans Affairs (DVA), the courts, or hospitals, as appropriate. The form will be available on OPM's website in PDF fillable format.

4. Items 1 – 5 are also found on the *Optional Application for Federal Employment* form, OF 612, and, *Declaration for Federal Employment* form, OF 306. These forms are generally used later in the application process before an applicant is actually appointed. Items 1 – 5 must be repeated, because in many cases the applicant applies for a job by forwarding only the employment application. When this occurs and the individual indicates that he or she is eligible for 10-point veterans' preference, the applicant must provide the SF 15 and supporting documentation. An applicant may also submit a certificate (letter) from DVA determining eligibility for a 10-point preference. We must have a means of identifying the material submitted to the examining office holding the employment application. These items aid in this identification process. The duplicate information is for identification purposes only.

If the documentation submitted is inadequate, the examining office must then contact the DVA or the appropriate branch of the Armed Forces. Items 6 – 9 are required by these organizations to identify the individual concerned.

Items 12 – 14 are necessary because they are self-eliminating questions. The answers will indicate whether the candidate needs to complete the rest of the form.

5. The collection of information does not impact small businesses or other small entities; the collection is from individuals only.

6. Veterans' preference is a factor considered in Federal hiring. Federal agencies will not be able to grant the veterans' preference benefit established by statute if the information is not collected. The collection usually occurs once; however, if applicants are applying for numerous positions, they usually submit photocopies of the SF 15 and documentation.

7. There are no special reporting or recordkeeping requirements that increase the burden on applicants.

8. In the 60-Day Notice, we proposed to submit to the Office of Management and Budget a request for clearance of an expiring information collection instrument and invited comments on the SF 15.

The notice was reported on January 26, 2007, at 72 FR 3880. At that time, OPM invited public comment on the need for information, its practical utility, the accuracy of OPM's burden estimate, and ways to minimize that reporting burden. OPM received 14 comments.

These comments included questions as to why we were reviewing the SF 15; whether we could continue to use the SF-15 in its current form; whether this review process was intended to remove 10-point veterans' preference for disabled veterans seeking federal employment; why we were seeking re-clearance; why members who regularly meet with OPM were not notified in advance of this Notice; whether the full social security number (SSN) was needed on the form and, if so, could it be masked to protect an individual from identity theft; who processes the SF 15 after an individual completes it; who signs the SF-15; why we use the term "burden" in the Notice; whether the SF-15 is used to collect data for statistical or census purposes; and whether there is a general clearinghouse to maintain all the SF-15's so veterans do not have to keep filling out the form each time they apply for a Federal job. Some comments proposed changes to the content of the form. We have included our detailed responses to the received comments in the 30-Day Notice.

9. No payment or gift is made to respondents.

10. The Privacy Act Statement printed on the form identifies limitations on disclosure. The Privacy System of Records covering this information is OPM Government 5: Recruiting, Examining, and Placement Records.

11. Questions 12, 13, and 14, concerning marital status, are of a personal nature. The law clearly provides that the marital status of spouses, widows, widowers, and mothers of veterans is

required in order to determine preference eligibility. Therefore, if application is made for spouse, widows, widowers, or mother's preference, the adjudicator must know the applicant's marital status.

12. No statistics are kept on the number of SF 15's completed or received by agencies and OPM. The Central Personnel Data File (CPDF) captures only the number of 10-point veterans hired into Federal Government, not the number who applied using the form. In the prior 60-Day Notice published this year, the General Services Administration reported the annual usage of the SF 15 as 45,000. This figure is based upon the number of forms sold as an indicator of usage. However, during February 2005, the SF 15 was placed on OPM's website as a fillable downloadable form. This was done to provide an easier mechanism to access, complete, and print the form when applying for employment. The number of 10-point veterans hired by the Federal Government has increased in each succeeding year. In order to make the most accurate estimate possible of the burden to the public in completing this form, we use CPDF data for 10-point veterans hired rather than GSA estimates based upon sales of forms. The CPDF data indicated that, during fiscal year 2005, there were at least 11,252 forms submitted (based upon 10-point veterans' preference individuals hired) and it took 10 minutes to complete the form. This provided the estimated annual burden of 1,875 hours. There is no cost to the respondent to complete this form.

13. There is no cost to respondents for the collection of information or its recordkeeping.

14. According to the General Services Administration annual usage of the SF 15 form is 45,000. However, as discussed above, the GSA figure is based upon sale of forms, as opposed to actual usage. The CPDF data for 10-point veterans hired indicated at least 11,252 forms were completed and processed in fiscal year 2005. We therefore calculated the approximate cost in processing these forms based upon CPDF information as the best estimate of annual usage of the SF 15 by veterans to obtain employment. This cost is calculated by processing the total forms indicated by CPDF (11,252) at a rate of \$2.66 per form for a total of \$29,930.32 plus 25% overhead (\$7,482.58) resulting in a total cost of \$37,412.90 to the government.

15. The reporting burden is 1,875 hours. Since OPM began providing the SF 15 in an easily accessible online version, both fillable and printable, agencies have hired greater numbers of disabled veterans into the Federal Government. The increasing use of SF 15s, and the reporting burden each successive year, is attributable to additional hiring of disabled veterans.

16. Not applicable. Information is not published.

17. A request is being made not to publish an expiration date. It is time-consuming and cost-prohibitive to keep reissuing this form only to change the OMB expiration date.

18. Not applicable.

## **B. Collection of Information Employing Statistical Methods.**

Not applicable.