

## **SUPPORTING STATEMENT**

### **Department of Defense Dependents Schools Overseas Employment Opportunities for Educators**

#### **A. JUSTIFICATION**

##### **1. Need for Information Collection.**

Titles 42 USC 2000e-2 and 20 USC 902, and 903 (Attachment 1) require the Department to ensure that both equal employment opportunity and employment and salary practices applicable to teachers and teaching positions overseas are in compliance with Federal laws (Attachment 1). This information collection is needed to recruit qualified educators for employment overseas with the Department of Defense Dependents Schools (DoDDS), to establish appropriate annual salary rates, to ensure that DoDDS is in compliance with equal employment opportunities practices, and to determine the effectiveness of DoDDS advertising efforts.

##### **2. Use of Information.**

The primary purpose of the information collection is to attract highly qualified educator applicants to join the Department of Defense Dependents Schools educational system. In addition, DoDDS is seeking to improve force diversity to better serve the students attending its schools.

The respondents for the information collection are educators or potential educators seeking employment overseas with DoDDS and the previous supervisors of these individuals.

There are four forms associated with this information collection (Attachment 2):

DoDEA Form 5010, "Department of Defense Dependents Schools (DoDDS) Application for Overseas Employment" is used to ascertain applicant's eligibility for a position as an educator. The information from the DoDEA Form 5010 is stored on computers at the Department of Defense Education Activity Personnel Center. The information is used for generating an applicant supply pool for various teaching positions within the DoDDS system. Applicable Public Act system of records for DoDEA Form 5010 is OPM/GOV-5 (Attachment 3).

DoDEA Form 5011, "Department of Defense Dependents Schools (DoDDS) Professional Evaluation" is used to obtain input from previous supervisors of applicants on their professionalism, teaching ability, intellectual and scholastic characteristics, and ability to work with children. This information is used by selecting officials to ensure selection of the best-qualified candidates. The applicant forwards this form to the evaluator. Applicable Public Act system of records for DoDEA Form 5011 is OPM/GOV-2 (Attachment 3).

DoDEA Form 5012, "Department of Defense Dependents Schools (DoDDS) Voluntary Questionnaire" is used for two purposes: to ensure the agency's personnel practices are in

compliance with Federal laws and to determine the effectiveness of our advertising efforts. The information is voluntary and is not considered in employment decisions. DoDEA Form 5012 does not require a Public Act systems notice as it does not ask for personally identifying information. However, Public Act system of records OPM/GOV-7 may be used to track ethnicity information when the data is filed by name or personal identified (Attachment 3).

DoDEA Form 5013, "Department of Defense Dependents Schools (DoDDS) Verification of Professional Educator Employment for Salary Rating Purposes" is used to validate the applicant's previous teaching experience and salary history. This information is vital in establishing an applicant's salary with DoDDS. Applicable Public Act system of records for DoDEA Form 5013 is OPM/GOV-1 (Attachment 3).

An on-line application system has been developed to support the DoDDS educator hiring process. This employment application system combines all elements of DoDEA Form 5010, DoDEA Form 5011, DoDEA Form 5012, and DoDEA Form 5013 into one web based system. This allows applicants to submit, modify, update and track applications on-line. The system allows information supplied by applicants to flow directly to the DoDDS applicant database as soon as submitted. Information supplied via the on-line application system is covered under Public Act Systems Notice OPM/GOVT-5 (Attachment 3).

The information collection has been used to support the agency's strategic plan, diversity recruitment efforts, and education reform. The information collection has and continues to be the agency's best source of diversity recruitment information for reporting and evaluation purposes.

### 3. Improved Information Technology.

The Department of Defense Education Activity (DoDEA) has implemented its on-line application system. Since our applicants live overseas and in all 50 of our States, we believe the automated application process greatly benefits our applicants.

The DoDEA web site is accessible to the public on the Internet (<https://webapps.dodea.edu/eas/>). Prospective employees are able to access information and apply on line. The result is greater convenience for the applicants. In the on-line version of the forms, questions that were repeated on more than one form only have to be answered once. The applicant is able to update his or her application quickly and easily and is able to check the status of the application any time, including during business hours and on evenings or weekends. Both applicants and the government benefit from decreased mailing and copying costs.

Information supplied via the on-line application system is covered under Public Act Systems Notice OPM/GOVT-5. All DoDEA employees, including all users of this system, receive annual Privacy Act and Personally Identifiable Information training. The online application system resides on a secure server at the Headquarters DoDEA site. Information is protected by limiting access to individuals who have a user identification and a password.

The use of web based links to other government, educational, and employment web sites makes our employment application accessible and visible to more people than ever. We estimate that 98% of applicants for employment apply on-line.

4. Efforts to Identify Duplication.

This information collection is unique to DoDDS. DoDDS is the only Federal agency that requires this information.

5. Methods Used to Minimize Burden on Small Entities.

The collection of information does not involve small businesses.

6. Consequences of Not Collecting the Information.

If the collection of information were not accomplished, DoDEA would not have the information needed to employ the best qualified educators.

7. Special Circumstances

There are no special circumstances. This collection will be conducted in a manner consistent with guidelines in 5 CFR 1320.5 (d) (2).

8. Agency 60-Day Federal Register Notice and Consultations Outside the Agency.

Agency 60-day Federal Register Notice was published in Volume 73, No. 45, March 6, 2008, pages 12138-12139, as required by 5 CFR 1320.8(d) (Attachment 4). No public comments were received in response to the notice.

This information has been reviewed by the following individuals:

Name	Organization	Phone Number
Sylvia Velez-Zuniga	DoDEA	703-588-3810
Jimmy Hunt	DoDEA	703-588-3916
Patti Ross	DoDEA	703-588-3915
Patty Lesjak-Davis	DoDEA	703-588-3904
Carla Sanguineti	DoDEA	703-588-3895
Margaret Coppedge	DoDEA	703-588-3900
Rob Stacey	DoDEA	703-588-3903
Russell Collins	DoDEA	703-588-3899

9. Payments to Respondents.

No payments to Respondents.

10. Assurance of Confidentiality.

This information collection does not ask the respondent to submit proprietary, trade secret, or confidential information to the Department.

#### 11. Personal Identifying Information and Sensitive Questions.

All information is protected by the Privacy Act of 1974 and is protected according to the regulations therein. The information will reside on a secure (https) site.

DoDEA Form 5010, "Department of Defense Dependents Schools (DoDDS) Application for Overseas Employment" is used to ascertain applicant's eligibility for a position as an educator. Applicable Public Act system of records for DoDEA Form 5010 is OPM/GOV-5 (Attachment 3).

Some questions on the DoDEA Form 5011, "Department of Defense Dependents Schools (DoDDS) Professional Evaluation," may be considered sensitive; however, the questions are not asked directly of the individual applying for the position. The respondent completing the form is providing a character reference for the job applicant. These questions are necessary to ensure (1) DoDDS does not hire unsuitable educators for our children and (2) the safety of the children in the DoDDS school system. Teachers are role models for some students; therefore, we want educators with personal traits that give promise of outstanding success. Applicable Public Act system of records for DoDEA Form 5011 is OPM/GOV-2 (Attachment 3).

Although there are sensitive questions asked on the DoDEA Form 5012, "Department of Defense Dependents Schools (DoDDS) Voluntary Questionnaire," the information is voluntary. The information from this form provides a system within DoDDS for periodically evaluating the effectiveness of 42 USC 2000e (Attachment 1), "Equal Employment Opportunity in Federal Government." DoDEA Form 5012 does not require a Public Act systems notice as it does not ask for personally identifying information. However, Public Act system of records OPM/GOV-7 may be used to track ethnicity information when the data is filed by name or personal identified (Attachment 3).

DoDEA Form 5013, "Department of Defense Dependents Schools (DoDDS) Verification of Professional Educator Employment for Salary Rating Purposes" is used to validate the applicant's previous teaching experience and salary history. This information is vital in establishing an applicant's salary with DoDDS. Applicable Public Act system of records for DoDEA Form 5013 is OPM/GOV-1 (Attachment 3).

#### 12. Estimates of Annual Response Burden Hours and Labor Costs to the Respondent for Collection of Information.

##### a. Response burden:

##### (1) DoDEA Form 5010 (respondents not using web-based system)

Total annual respondents:	10
Frequency of response:	1
Total annual responses:	10

Avg Burden per response: 30 mins  
Total Burden hours: 300 mins

(2) DoDEA Form 5011 (respondents not using web-based system)

Total annual respondents: 30  
Frequency of response: 1  
Total annual responses: 30  
Avg Burden per response: 10 mins  
Total Burden hours: 300 mins

(3) DoDEA Form 5012 (respondents not using web-based system)

Total annual respondents: 10  
Frequency of response: 1  
Total annual responses: 10  
Avg Burden per response: 2 mins  
Total Burden hours: 20 mins

(4) DoDEA Form 5013 (respondents not using web-based system)

Total annual respondents: 1,000  
Frequency of response: 1  
Total annual responses: 1,000  
Avg Burden per response: 5 mins  
Total Burden hours: 1,500 mins

This form is to validate previous teaching experience and salary history of only those applicants being hired. Some applicants that are being hired may have more than one form from former employees for verification of employment history.

(5) Employment Application System (EAS) (web-based system)

Total annual respondents: 29,200  
Frequency of response: 1  
Total annual responses: 29,200  
Avg Burden per response: 10 mins  
Total Burden hours: 292,000 mins

The 10 minute per response for the EAS process was calculated based on 7,300 respondents applying annually on-line (25 minutes per average response) = 182,500 minutes. Each of those applicant/respondents will have 3 references providing evaluations on-line for a total of 21,900 evaluator/respondents (5 minutes per average response) = 109,500 minutes. 182,500 minutes + 109,500 minutes = 292,000 minutes (or 4,867 hours)/29,200 respondents = 10 minutes.

(6) Total Average Annual Response Burden

Total annual respondents: 30,250  
 Frequency of response: 1  
 Total avg annual responses: 30,250  
 Burden mins per response: 10 avg mins.  
 Total burden hours: 4,960  
**Average burden per response:** total burden minutes 297,620 divided by 30,250 total responses = 10 average minutes (9.8452).

**Total average burden hours:** Total annual responses = 30,250 multiplied by average burden per response 9.8387 minutes divided by 60 minutes = 4,960 total average burden hours.

b. Explanation of How Burden was estimated.

The burden was estimated by observing individuals completing the forms and talking to individuals who have completed the forms.

c. Cost to Respondent.

These respondents will be completing the forms on their own time. The estimated cost is approximately \$30 per hr (\$.60/min), calculated using the following formula.

Average Annual Salary/weeks per year/hours per day/days per week = hourly rate

- (1) DoDEA Form 5010 (respondents not using web-based system)
  - 30 mins per form x \$.60/min = \$18.00 x 10 respondents = \$180
- (2) DoDEA Form 5011 (respondents not using web-based system)
  - 10 mins per form x \$.60/min = \$6.00 x 30 respondents = \$180
- (3) DoDEA Form 5012 (respondents not using web-based system)
  - 2 mins per form x \$.60/min = \$1.20 x 10 respondents = \$12
- (4) DoDEA Form 5013 (respondents not using web-based system)
  - 5 mins per form x \$.60/min = \$3.00 x 1,000 respondents = \$3,000
- (5) Employment Application System (EAS) (web-based system)
  - 17 mins per form x \$.60/min = \$10.20 x 30,250 respondents = \$308,550

**TOTAL LABOR COSTS TO THE RESPONDENTS** **\$308,550**



13. Estimates of Cost Burden for the Respondent for Collection of Information.

a. There are no capital or start-up costs associated with this information collection.

b. Operation and Maintenance Cost.

There are normally fees for Internet access; however, it is unlikely that the respondent will be using the Internet solely for this purpose. The cost involved for connectivity for this program is negligible.

(1) Mailing and copying of DoDEA Form 5010, DoDEA Form 5011 and DoDEA Form 5012 will no longer be a financial consideration since these forms may be filled out and sent in on-line. DoDEA Form 5013 will only be required of applicants selected for hire (approximately 1,000 applicants annually).

1,000 DoDEA Form 5013 at \$.41 per form = \$410.

(2) Supporting documentation will now only be required of applicants who are selected for hire. This should be approximately 1,000 applicants per year.

Transcripts-average cost	\$10,000
(\$10 per 1000 applicants)	
PRAXIS Exam-average cost*	\$1,500

\*(Now only needed from applicants when exam is not required for state certification or from applicants without state certification. This is estimated to be less than 10% of the educators selected for hiring. Allowing for increased average cost of Exam to \$150 x 1% of 1,500 applicants selected for hire.)

TOTAL O&M COST TO RESPONDENTS: \$11,870.

14. Estimates of Cost to Federal Government:

a. DoDEA Form 5010

Initial Review	
Staffing Assistant	
Hourly cost GS-5/7, (16.96/hr. x 5 min = \$1.41)	
(10 respondents)	\$14.13

Processing	
Staffing Clerk	
Hourly cost GS-5/7, (\$16.96/hr. x 4 min = \$1.13)	
(10 respondents)	\$11.31

b. DoDEA Form 5011

Initial Review  
 GS-5/7, Staffing Assistant  
 Hourly cost GS-5/7, (\$16.96/hr. x 1 min = \$ .28)  
 (30 respondents) \$8.48

Processing  
 Staffing Clerk  
 Hourly cost GS-5/7, (\$16.96/hr. x 4 min = \$1.13)  
 (30 respondents) \$33.92

c. DoDEA Form 5012

Initial Review  
 GS-5/7, Staffing Assistant  
 Hourly cost GS-5/7, (\$16.96/hr. x 1 min = \$.28)  
 (10 respondents) \$2.83

d. DoDEA Form 5013

Initial Review  
 GS-5/7, Staffing Assistant  
 Hourly cost GS-5/7, (\$16.96/hr. x 1 min = \$ .28)  
 (1,000 respondents) \$282.67

e. Web Site Cost

Initial Review  
 GS-5/7, Staffing Assistant  
 Hourly cost GS-5/7, (\$16.96/hr. x 20 min = \$5.65)  
 (47,000 considered respondents) \$265,706.60

Processing  
 Staffing Clerk  
 Hourly cost GS-5/7, (\$16.96/hr. x 20 min = \$5.65)  
 (47,000 considered respondents) \$265,706.60

These forms are only a small subset of the DoDEA web site. Cost for maintenance of these forms on the web site is negligible.

TOTAL COSTS TO THE GOVERNMENT: \$531,767

15. Change in Burden.

The change in the cost of the burden is due to the increase of educators applying for employment.



16. Publication Plans/Time Schedule.

The results for collection of this information will not be published.

17. Approval Not to Display Expiration Date.

The agency will display the expiration date.

18. Exceptions to the Certification Statement.

There are no exceptions to the Certification Statement.

B. COLLECTION OF INFORMATION EMPLOYING STATISTICAL METHODS.

This information collection does not employ statistical methods.