

## SUPPORTING STATEMENT FOR EXTENSION OF OPM FORM 1203 - FX

### Justification

1. **Explain the circumstances that make the collection of information necessary. Include identification of any legal or administrative requirements that necessitate the collection.**

OPM is responsible for open competitive examinations for admission to the competitive service in accordance with section 3304 of title 5, United States Code. OPM is specifically authorized to collect such information as required to carry out its responsibility to examine applicants for competitive service positions. Section 1104 of title 5 allows OPM to authorize agencies to rate applicants for Federal jobs. A copy of the cited statute is presented in Attachment 1 (sections 1104, 1302, 3301, and 3304 of title 5, United States Code).

2. **Indicate how, by whom, and for what purpose the information is to be used.**

Under continuing efforts to modernize and streamline the Federal examining system, many job vacancies are filled from applicants whose applications reside in an electronic applicant tracking system. OPM has expanded the use of automated staffing systems in order to more effectively identify the best qualified applicants to meet agency staffing needs. With this form we collect information from applicants regarding their background and experience. The information collected on this form is loaded to a computerized applicant tracking system, which enables automated screening of applicants based on employment availability and qualifications. Collection of applicant information with this form permits OPM to make faster and more appropriate selections of applicants in order to meet agencies' specific recruiting needs.

3. **Describe whether, and to what extent, the collection of information involves the use of automated, electronic, mechanical or other technological collection techniques or other forms of information technology e.g., permitting electronic submission of responses, and the basis for the decision for adopting this means of collection.**

The information must be collected from all job applicants. Most applicants enter this information using a user-friendly online application via the internet. At least 95% of applicants use the electronic means when applying for Federal jobs. The paper version of the form is used by job applicants who cannot (e.g., persons with disabilities) or choose to not use the electronic means of applying. Forms are available on OPM's Forms web site (<http://www.opm.gov/forms>) and via a "Forms" link on OPM's USAJOBS web site (<http://www.usajobs.opm.gov>).

4. **Describe efforts to identify duplication.**

OPM is the sole authority to collect this information, therefore, duplication is minimized.

5. **If the collection of information impacts small businesses or other small entities, describe the methods used to minimize the burden.**

Not applicable

6. **Describe the consequence to Federal program or policy activities if the collection were conducted less frequently.**

Less frequent collection in this context would equate to fewer applications for Federal employment. Fewer applications could significantly impair the ability of Federal agencies to fill critical job vacancies.

7. **Explain any special circumstances that would cause an information collection to be conducted in a manner inconsistent with the guidelines in 5 CFR 1320.6.**

Not applicable

8. **If applicable, provide a copy and identify the date and page number of publication in the Federal Register of the agency notice, required by 5 CFR 1320.8(d), soliciting comments on the information collection prior to OMB.**

A notice of proposed information collection was published in the Federal Register on September 18, 2009 (*Federal Register Notice / Volume 74, No. 180*), as required by 5 CFR 1320, allowing the public an opportunity to comment on the form. Three comments were received.

The Department of Treasury commented, "With the increased use of automated systems such as USAJobs and

CareerConnector which interact w/applicants and collect information, the OPM Form 1203-FX (August 2002) has become out-of-date and is no longer required. The majority of the data elements are now captured through automated applications systems, other standard forms, and the increased use of Entry on Duty systems that automate the collection of data needed for the pre-employment decision.

In specific response to the items listed in the Federal Register request, the general consensus of the IRS HCO is that OPM Form 1203-FX does not minimize the burden of the collection of information on applicants, enhance the clarity of the information collected, or have a practical utility for the IRS. The proposed collection of information through form 1203-FX is not necessary for proper performance of the functions of the IRS, including through the use of appropriate automated, electronic, mechanical, or other technological collection techniques.”

OPM replied, “We appreciate the time that you and your colleagues invested in reviewing the Federal Register notice and the OPM Form 1203-FX. The Information Collection refers not only to the paper version of the OPM Form 1203-FX but also the electronic version. The form, paper or electronic, is used by applicants when applying for jobs with Federal agencies that use USA Staffing as their automated examining system. Please let me [Denise Valentine-Tyson] know if you have additional questions or if I can provide further information.

The Alcohol and Tobacco Tax and Trade Bureau (TTB) commented,

1. For consistency, the last choice in 5D should read: 11 plus nights/month
2. I’ve never known anyone to use this form.”

OPM replied that we had processed over 39,000 paper versions of the 1203-FX last fiscal year.

The Veterans Administration commented, “Is the name the only change OPM is making to the subject form?”

OPM replied, “In addition to the name change, we also changed the wording in the instructions to make them clearer. If you have any further questions, please contact me [Denise Valentine – Tyson].”

**9. Explain any decision to provide any payment or gift to respondents other than reenumeration of contractors or grantees.**

Not applicable.

**10. Describe any assurance of confidentiality provided to respondents and the basis for the assurance in statute, regulation, or agency policy.**

The information collected is maintained in a secure electronic application tracking system. Access to the information collected on this form is strictly controlled and limited to appropriate OPM personnel and authorized Federal personnel from other agencies. The paper forms are maintained in confidential files. All authorized personnel with access to this information agree to and adhere to rules of behavior on the safe handling of data when accessing information collected. This is in accordance with the Office of Management and Budget (OMB) Memorandum M-06-16<sup>1</sup>, Protection of Sensitive Agency Information. All records developed from the information collected will be purged and destroyed in accordance with record keeping schedules. OPM certifies that the information collection complies with the Privacy Act of 1974.

**11. Provide additional justification for any questions of a sensitive nature such as sexual behavior and attitudes, religious beliefs, and other matters that are commonly considered private.**

Not applicable.

**12. Provide estimates of the hour burden of the collection of information.**

Due to the fact that this form is used to collect qualifications information for a variety of occupations, as well as the varying levels of experience of the applicants, completion time varies. The burden estimate is also influenced by the number of occupational questions for a specific vacancy announcement and the type of questionnaire used to assess applicants. OPM previously reported that 54,202 respondents per year would complete the paper version of the form. However; we found that on average 31,389 applicants used the paper version while an average of 3,484,764 respondents applied using the electronic version annually. The average completion time is 45 minutes for the 1203-FX; yielding an estimated annual burden of 2,613,573 hours.

**13. Provide an estimate of the total annual cost burden to respondents or record keepers resulting from the collection of information.**

There is no cost to the applicant.

**14. Provide estimates of annualized cost to the Federal Government. Also provide a description of the method used to estimate cost which should include quantification of hours, operational expenses (such as equipment, overhead, printing, and support staff) and any other expenses that would not have been incurred without the paperwork burden.**

The annualized cost to the Federal government is estimated at \$468,280 for the OPM Form 1203-FX. This cost includes overhead, direct labor, forms design, development, and printing.

**15. Explain the reasons for any program changes or adjustments reported in Items 13 or 14 of the OMB Form 83-I.**

The change in the public burden varies based on the number of applicants using OPM Form 1203-FX and the number of questions asked on the questionnaire.

OPM reported a burden estimate of 27,101 hours in 2006. We are increasing that burden estimate by 2,586,472 hours. The increase is due to a change in how OPM reports 1203-FX completion. Previously, OPM reported totals only for the completion of the paper version of the form. OPM now includes completion of the electronic version of the form in its totals. Also, there has been a substantial increase in the number of applicants for Federal positions, increasing the number of OPM Form 1203-FX submissions.

**16. For collections of information whose results will be published, outline plans for tabulation and publication.**

Not applicable. The results of this information collection are not published.

**17. If seeking approval to not display the expiration date for OMB approval of the information collection, explain the reasons that display would be inappropriate.**

We do not seek approval to not display the expiration date.

**18. Explain each exception to the certification statement identified in Item 19, "Certification for Paperwork Reduction Act Submissions," of OMB Form 83-I.**

No exceptions

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<sup>i</sup> OMB Memorandum M-06-16, *Protection of Sensitive Agency Information*  
<http://www.whitehouse.gov/omb/memoranda/fy2006/m06-16.pdf>