

FINAL SUPPORTING STATEMENT
FOR
Employment Application System for Entry-Level Legal Positions
(3150-XXXX)
NEW

Description of the Information Collection

The Nuclear Regulatory Commission (NRC) will use a Web-based system to track, manage, and interact with applicants seeking entry-level or temporary, summer legal positions. Applicants seeking employment consideration will submit application materials, including cover letters, resumes, school transcripts, lists of references, and writing samples, via a Web-based interface. These application materials may contain names, addresses, phone number, email addresses, school information/grades, employment information/histories, and works of writing.

A. JUSTIFICATION

1. Need For and Practical Utility of the Collection of Information

Section 161(d) of the Atomic Energy Act of 1954 and the Energy Reorganization Act of 1974 allows the Commission to appoint employees as may be necessary to carry out the functions of the Commission. In order to fulfill its vital mission of protecting people and the environment, the NRC relies on a workforce that possesses detailed knowledge and specialized technical skills. In order to thoroughly review and assess the qualifications of applicants seeking employment with the Commission, it is necessary for them to submit application materials and related information, as listed above.

The NRC has chosen the Symplicity HiRE Law Edition system to meet certain hiring needs of the NRC Office of the General Counsel (OGC). Specifically, the system will be used to manage the Commission's two primary entry-level attorney programs: the Honor Law Graduate Program and the Summer Internship Program.

Symplicity HiRE Law Edition provides a distinct service that will provide significant benefit to the NRC and OGC in the recruitment of entry-level attorneys. The most notable and unique feature of this system is that it fully integrates with the majority (over 200) of U.S. law school career services offices that exclusively subscribe to the Symplicity Career Services Manager system for their recruitment events and programs. This direct connection to the majority of U.S. law school career services offices will establish a direct pipeline allowing the OGC to communicate directly with law students, who otherwise may not be familiar with the Commission and its entry-level attorney recruitment programs, using a web-based interface that is easy-to-use and familiar to them. This feature will help save valuable outreach staff hours while allowing the OGC to reach more potential applicants with the specialized knowledge and skills needed to support the NRC's important mission.

2. Agency Use of Information

The NRC Office of the General Counsel (OGC) plans to collect the information (i.e., application materials listed above) for the purpose of thoroughly reviewing and

assessing the qualifications of applicants seeking employment through the OGC Honor Law Graduate Program or Summer Internship Program. Internal, designated OGC recruitment staff will receive and manage the information collected.

3. Reduction of Burden Through Information Technology

There are no legal obstacles to reducing the burden associated with this information collection. The NRC encourages respondents to use information technology when it would be beneficial to them. NRC issued a regulation on October 10, 2003 (68 FR 58791), consistent with the Government Paperwork Elimination Act, which allows its licensees, vendors, applicants, and members of the public the option to make submissions electronically via CD-ROM, e-mail, special Web-based interface, or other means. It is estimated that approximately 100% of the potential responses will be filed electronically.

Today, the majority of private, public, and government employers require applicants seeking employment with their companies or Agencies to submit electronic application materials. Most job seekers have an understanding and expectation regarding the automated process of electronically submitting applications through Web-based interfaces. The Symplicity HiRE Law Edition system will significantly reduce the burden on applicants in that it will allow them to electronically submit their application materials through a Web-based interface for the OGC Honor Law Graduate Program and Summer Internship Program.

4. Effort to Identify Duplication and Use Similar Information

No sources of similar information are available. There is no duplication of requirements. NRC has in place an ongoing program to examine all information collections with the goal of eliminating all duplication and/or unnecessary information collections.

The NRC posts individual vacant positions by job title/series so as to allow applicants to submit application materials only for the positions that are of interest to them. This also allows applicants to tailor their application materials specifically for the positions for which they are applying. This allows the Commission to accurately and thoroughly assess applicant qualifications for each individual position for which they applied. This is also the case with the OGC Honor Law Graduate Program and the Summer Internship Program.

5. Effort to Reduce Small Business Burden

Not applicable. All respondents are individuals seeking employment with the NRC, who are responding in a personal capacity, not as a business.

6. Consequences to Federal Program or Policy Activities if the Collection Is Not Conducted or Is Conducted Less Frequently

The NRC solicits applicants for the OGC Honor Law Graduate Program and Summer Internship Program on an annual basis. These programs are the primary vehicles for hiring legal staff at the NRC. They are vital for ensuring that the OGC is consistently adequately staffed with employees that possess the detailed knowledge and

specialized technical skills necessary to carry out the OGC's function and support the NRC's unique mission.

If these programs were no longer conducted or conducted on a less frequent basis, there would be serious impacts to the OGC's ability to carry out its important function within the Commission; there would be gaps in personnel, workload burden increases, and a potential loss of talented staff.

7. Circumstances Which Justify Variation from OMB Guidelines

No applicable.

8. Consultations Outside the NRC

Opportunity for public comment on the information collection requirements for this clearance package was published in the Federal Register on August 9, 2011 (76 FR 48908).

The Equal Employment Opportunity Commission submitted the following comment:

In order to ensure that this proposed web-based application system does not pose any difficulties for individuals with disabilities (which can happen with web-based application systems), NRC should make clear that reasonable accommodation will be provided to individuals who need one for any and all stages of the application process. Contact information for requesting reasonable accommodation should also be provided.

Under Section 508 (29 U.S.C. 794d), agencies must give disabled employees and members of the public access to information that is comparable to the access available to others. The NRC will ensure compliance with Section 508 legal and regulatory requirements when we procure the product. The NRC will provide contact information on the hiring program website for individuals who may need reasonable accommodation and assistance with any stage of the application process.

9. Payment or Gift to Respondents

Not applicable.

10. Confidentiality of Information

Confidential and proprietary information is protected in accordance with NRC regulations at 10 CFR 9.17(a) and 10 CFR 2.390(b). However, no information normally considered confidential or proprietary is requested. Symplicity HiRE will be covered by NRC's currently published Privacy Act system of records notice NRC-28 Merit Selection Records. Personally Identifiable Information included within application materials will be protected accordingly.

11. Justification for Sensitive Questions

Not applicable.

12. Estimated Burden and Burden Hour Cost

The NRC anticipates receiving 1,500 applications annually for the OGC Honor Law Graduate Program and Summer Internship Program. The estimated burden per response is one hour. The total estimated reporting burden is 1,500 hours annually (1,500 responses x 1 hour per response). There are no recordkeeping requirements. The total estimated cost to respondents is \$409,500 (1,500 hours x \$273/hr).

13. Estimate of Other Additional Costs

There are no additional costs.

14. Estimated Annualized Cost to the Federal Government

Symplicity HiRE Law Edition is a web-based system owned by the Symplicity Corporation. The NRC will contract with the Symplicity Corporation to use its system to track, manage, and interact with employment applicants. The total cost to the NRC for subscription to Symplicity HiRE Law Edition for the first year is \$4,500 for the base system, \$1,125 for the summer associate module, and a one-time subscription setup fee of \$3,000 for a total cost of \$8,625. The cost for each subsequent option year is \$5,625 per year. The total cost for three (3) years is \$19,875; therefore, the average annual cost to the Federal government over the three year clearance period is \$6,625 annually.

All expected 1,500 respondents per annum will be initially reviewed once to determine if their qualifications meet the requirements of the OGC programs. These reviews will be conducted by professional staff and will take approximately 10 minutes per respondent. This equates to 250 professional staff hours for a cost of \$68,250 per annum (250 hours x \$273/hr).

Of the expected 1,500 respondents per annum, it is anticipated that 1/3 or 500 respondents will need to be further assessed (e.g., reviews of employment histories, school transcripts and coursework, and writing samples) by professional staff for approximately one (1) hour per respondent. This equates to 500 professional staff hours for a cost of \$136,500 per annum (500 hours x \$273/hr).

Of the 500 respondents that will receive further assessment, it is anticipated that 1/10 or 50 will receive even further assessment (e.g., interviews, reference checking, preliminary background checking) by professional staff for approximately three (3) hours per respondent. This equates 150 professional staff hours for a cost of \$40,950 per annum (150 hours x \$273/hr).

The total annual cost to the Federal government is therefore \$252,325 (\$6,625 for subscription costs and \$245,700 for professional staff hours).

15. Reasons for Change in Burden or Cost

The collection is a new collection that will enable the NRC to track, manage, and interact with applicants seeking entry-level or temporary, summer legal positions. Applicants seeking employment consideration will submit application materials, including cover letters, resumes, school transcripts, lists of references, and writing

samples, via a Web-based interface. Implementation of this system will result in 1,500 additional burden hours to applicants to submit application materials to the NRC.

16. Publication for Statistical Use

Not applicable.

17. Reason for Not Displaying the Expiration Date

Not applicable.

18. Exceptions to the Certification Statement

None.

B. COLLECTIONS OF INFORMATION EMPLOYING STATISTICAL METHODS

Not applicable.