# 1SUPPORTING STATEMENT U.S. DEPARTMENT OF COMMERCE U.S. CENSUS BUREAU FORM BC-170, CENSUS EMPLOYMENT INQUIRY OMB 0607-0139

#### A. Justification

# 1. <u>Necessity of Information Collection</u>

The Census Bureau requests continued OMB approval for the BC-170A, BC-170B, and the BC-170D, Census Employment Inquiry. We are also requesting minor modifications to the data collected. The BC-170 is used to collect information such as personal data and work experience from job applicants. Selecting officials review the information shown on the form to evaluate an applicant=s eligibility for employment and to determine the best qualified applicants to fill Census jobs.

The BC-170 is used throughout the census and intercensal periods for the special census, pretests, and dress rehearsals for short-term time limited appointments. Applicants completing the form BC-170D for a census related position are applying for temporary jobs in office and field positions (clerks, enumerators, crew leaders, supervisors). In addition, as an option to the OF-612, Optional Application for Federal Employment, the BC-170A may be used when applying for temporary/permanent office and field positions (clerks, field representatives, supervisors) on a recurring survey in one of the Census Bureau=s 12 Regional Offices (ROs) throughout the United States. The Form BC-170B is used for special censuses for temporary field positions (enumerators).

The use of this form is limited to only situations which require the establishment of a temporary office and/or involve special, one-time or recurring survey operations at one of the ROs. In preparation for the next decennial census, the BC-170 is intended to expedite hiring and selection in situations requiring large numbers of temporary employees for assignments of a limited duration. The form has been demonstrated to meet our recruitment needs for temporary workers and requires significantly less burden than the Office of Personnel Management (OPM) Optional Forms that are available for use by the public when applying for Federal positions.

The form has been slightly modified for specific usage by each of the three areas of usage. The variation of forms by operation, is to collect specific data needed based on the nature of the operation. The area of difference relates to the collection of work history. A cover sheet will be attached to each respective BC-170 to provide applicants with a brief description of their prospective job duties with the Census Bureau; the cover sheet message will vary for decennial, special censuses, or recurring survey positions. The modified cover sheet is attached to each form (Attachments 1, 2 and 3).

This collection is authorized by Title 13, United States Code, Section 23 a and c,

Additional officers and employees.

### 2. Needs and Uses

The BC-170 (A, B and D) is completed by job applicants before or at the time they are tested. Selecting officials will review the information shown on the form and determine the applicant=s employment suitability. Failure to collect this information could result in the hiring of unsuitable and/or unqualified workers.

# 3. <u>Use of Information Technology</u>

Investigation is currently underway to make the BC-170 available on-line via the Internet for public access. Interested applicants will be able to download and print the application.

## 4. Efforts to Identify Duplication

The BC-170 (A, B and D) is intended to facilitate speedy hiring and selection in situations requiring large numbers of temporary employees for assignments of a limited duration. Accordingly, the use of the BC-170 will be limited to only situations which require the establishment of a temporary office and/or involve special, one-time or recurring survey operations. This will avoid undue paperwork.

#### 5. Efforts to Minimize Burden

The proposed form has been demonstrated to meet our needs for hiring temporary workers and requires significantly less burden than the OPM Optional Forms that are available for use by the public when applying for a Federal position.

### 6. Consequences of Less Frequent Collection

Completion of this form is a one-time collection.

### 7. <u>Special Circumstances</u>

There are no special circumstances.

#### 8. Consultations Outside the Agency

The Census Bureau=s Human Resources Division has consulted with the Office of Human Resource Management, Department of Commerce, on an ongoing basis since 1984. Since that time, several revisions have been suggested and incorporated. Currently, the Census Bureau=s Human Resources Division has approval from the Department of Commerce to use this form for employment purposes.

A notice was published in the Federal Register on April 25, 2011 (76 FR pages 22864-22865.) Two comments were received. One comment generally opposed the Census Bureau recruiting any applicants. The second comment was from the Equal Employment Opportunity Commission (EEOC) and concerned the guidance to applicants about the Census Bureau's application process and background investigation. We have revised the forms per the EEOC recommendation.

## 9. <u>Paying Respondents</u>

We do not pay applicants or provide them gifts for applying for a federal position.

## 10. Assurance of Confidentiality

The confidentiality of information contained on the BC-170 will be maintained according to the provisions of the Privacy Act, 5 U.S.C., 552a. The applicants are provided a copy of the Privacy Act Statement which appears on page 6 of the BC-170A and BC-170B, and on page 4 of the BC-170D.

### 11. Justification for Sensitive Questions

The BC-170 contains questions of a sensitive nature relating to criminal charges and indebtedness to the Federal government. These questions are necessary to determine the applicants = suitability for census jobs.

#### 12. Estimate of Hour Burden

Respondents complete the BC-170 only once. Based on past experiences, the BC-170 on average takes about 15 minutes to complete. On an annual basis, approximately 65,000 applicants are expected to apply. The annual burden would be 16,250 hours.

#### 13. Estimate of Cost Burden

The only cost to the respondent is his/her time for completing the BC-170.

### 14. Cost to Federal Government

Estimated cost for printing and keying the BC-170 is \$ 30,766. This cost was estimated based on the current cost of printing the form. The cost is budgeted for and paid for by the Bureau of the Census.

#### 15. Reason for Change in Burden

The decrease in reporting burden is due to the completion of the 2010 Census and the reduction in the number of positions and applicants.

# 16. <u>Project Schedule</u>

As mentioned earlier, the BC-170 (A, B and D) is used throughout the census and intercensal periods for the special censuses, pretests, and dress rehearsals for short-term time limited appointments.

# 17. Request not to Display Expiration Date

Since the BC-170 is used frequently and does not change often, we are requesting to continue not displaying the expiration date of the collection on the form to avoid needless reprinting.

# 18. Exceptions to the Certification

There are no exceptions.

### Attachments:

- 1. Form BC-170A
- 2. Form BC-170B
- 3. Form BC-170D