

**Supporting Statement for the
Application for Employment with the
Board of Governors of the Federal Reserve System
(FR 28/FR 28s/FR 28i; OMB No. 7100-0181)**

Summary

The Board of Governors of the Federal Reserve System, under delegated authority from the Office of Management and Budget (OMB), proposes to extend for three years, with revision, the Application for Employment with the Board of Governors of the Federal Reserve System (the Application) (FR 28/FR 28s/FR 28i; OMB No. 7100-0181). The Application is required to obtain a benefit and collects information to determine the qualifications and availability of applicants for employment with the Federal Reserve Board. The Application collects information on education and training, employment record, military service record, and other information since the time the applicant left high school. Included with the Application are two supplemental questionnaires: (1) The Applicant's Voluntary Self-Identification Form (FR 28s), which collects information on the applicant's gender and ethnic group and (2) The Research Assistant Candidate Survey of Interests (FR 28i), which collects information from candidates applying for Research Assistant positions on their level of interest in economics and related areas.

The Federal Reserve proposes to revise the FR 28 by (1) deleting the country of citizenship question in the case of non-citizens, (2) deleting the Military Service section, and (3) modify several criminal background questions. The Federal Reserve is also proposing to revise the FR 28i by updating the list of software packages used by the candidate, and adding a section for the candidate to write in their own career objectives. Copies of the draft FR 28, and FR 28i, are attached.

The Federal Reserve receives approximately 3,500 applications per year, solicited and unsolicited. The total annual reporting burden is estimated to be 3,558 hours.

Background and Justification

The Application in its current format has been used for more than 20 years. Over the years, the Application has been modified to keep pace with changes in staffing requirements and to comply with laws that have been enacted or amended to protect the applicant and the information provided on the Application. Such laws include the Age Discrimination in Employment Act (29 U.S.C. 621 et seq.), the Civil Rights Act (42 U.S.C. 2000e-16), the Equal Pay Act (29 U.S.C. 206(d)), the Immigration Reform and Control Act of 1986 (8 U.S.C. 1324(a) and 1324(b)), the Privacy Act (5 U.S.C. 552a), and the Rehabilitation Act (29 U.S.C. 791 et seq.).

The Application may be used to examine, rate, or assess the applicant's¹ qualifications, to determine if the applicant is entitled to rights or benefits under certain laws and regulations, and to contact the applicant to arrange an interview. After the Federal Reserve evaluates an Application, the applicant is either contacted for an interview or notified in writing that he or she does not qualify for any open positions.

¹ An applicant is any person who meets the published minimum qualifications for a specific position and has expressed interest in or been considered for that position.

In 2001, the Board implemented the Applicant's Voluntary Self-Identification Form (FR 28s) in order for an applicant to identify his or her gender and ethnic group. The Board also implemented the Research Assistant Candidate Survey of Interests (FR 28i) which is used to better match a research assistant (RA) candidate's interests with the different research areas at the Board.

In December 2004, the FR 28 was revised to include the applicant's email address and cell phone number. This information is used as an alternate source to contact applicants. In addition, the FR 28 was modified to inform applicants that educational claims must be from an accredited school. The FR 28s was modified to be consistent with the Office of Management and Budget's (OMB's) Statistical Policy Directive No. 15, (Race and Ethnic Standards for Federal Statistics and Administrative Reporting). The FR 28i was modified to update the areas of interest, change the rating scale format, add a section on software packages used by the candidate, and add a line for the candidate's name.

In 2007, the FR 28 was revised to (1) delete the social security number question, (2) expand the country of citizenship question in the case of non-citizens, (3) add several criminal background questions, (4) expand the Notes section to provide more detail about an applicant's rights and responsibilities, and (5) revise the confidentiality status for and treatment of certain information provided on the Application. The FR 28i was revised to modify the areas of interest, add a more detailed section on software packages used by the candidate, add a section for the candidate's career objectives, and change the rating scale format of the survey.

In 2010, the FR 28i was revised to (1) expand the list of research topics of interest to candidates, (2) the list of software packages and statistical languages used by candidates was updated, and (3) the portion of the survey that asks for the future objectives of the candidates was eliminated from the report.

Description of Information Collection

The Federal Reserve receives approximately 3,500 applications per year, both solicited and unsolicited, from members of the public who would like to be considered for employment at the Board. Since the applicant is usually either hired by the Board or finds other employment within the two years that the Board retains the Application, the applicant generally files the Application once.

The Application comprises eight sections: Background, Education and Training, Employment Record, Military Service Record, References, General, Remarks, and Notes. The first six sections collect information on specific aspects of the applicant's qualifications. The Background section collects name, address, telephone, and citizenship information and the position for which the applicant is applying. The Education and Training section collects detailed information on the applicant's educational history and skills set. The Employment Record section collects a chronological summary of work experience. The Military Service Record section collects information on service branch, rank, duties, and discharge. The References section collects information on three references. The General section collects information on criminal records, discharge from employment, willingness to travel, and relations to or acquaintances with Board staff or officers and directors of financial institutions. The Remarks section provides the applicant an opportunity to provide further information regarding

his or her qualifications. The Notes section explains what is required of the applicant prior to an interview and what may be required of the applicant if he or she is offered a position (for example, transcripts, medical examination, or drug test).

The FR 28s comprises two sections: Gender and Ethnic Group. Applicants are asked to check the box that corresponds to their gender and ethnic group (White, Black, Asian or Pacific Islander, American Indian or Alaskan Native, and Hispanic). The Board uses this information to comply with federal equal employment opportunity (EEO) recordkeeping and reporting requirements, other legal requirements, and as an input to its self-analysis of hiring practices. Information collected on the FR 28s has no bearing on the determination of an applicant's job-related qualifications and completion of the self-identification form is voluntary.

The FR 28i comprises three sections where RA candidates are asked to rate their level of: (1) interest in categories of economics and related research areas, (2) experience with various software packages and statistical programming languages, and (3) interest in pursuing educational opportunities after leaving the Board. The FR 28i helps to streamline the recruitment process and reduce some of the frustration of offering positions that RA candidates subsequently turn down.

Proposed Revisions

Application (FR 28)

The Federal Reserve proposes to revise the Background section by:

- Deleting the question regarding country (or countries) of citizenship if the applicant is not a United States citizen. In 2007, the Federal Reserve added a question regarding an applicant's country of citizenship (in the case of a non-citizen) to help determine whether the individual would be eligible for positions that required access to Confidential Supervisory Information (CSI) or Federal Open Market Committee (FOMC) information above Class III.² However, the Federal Reserve now proposes to delete this question because: (1) the Board generally only hires U.S. citizens or nationals; (2) a non-citizen's country of citizenship is but one factor in determining whether a non-citizen is eligible for a position that requires access to CSI or FOMC information above Class III so this information alone would not definitively resolve the issues of eligibility for hire; and (3) information regarding citizenship can readily be obtained directly from the few employees who are non-citizens and require access to CSI or FOMC information above Class III.
- Deleting the Military Service section. This section was used to determine whether an applicant was entitled to preference in hiring under the Veterans' Preference Act and the Federal Reserve Board has determined that it is not subject the Veterans' Preference Act and, based on EEOC guidance, may not voluntarily comply with it. Thus, this section is no longer necessary.

The Federal Reserve proposes to modify the General section by:

- Revising question 1 to include (1) convictions of a crime, imprisoned, on probation, or on parole during the last 7 years, (2) adding the statement "You must include felonies,

² This classification is generally applied to less-sensitive background information supporting policy discussions.

firearms or explosives violations, military court-martials, misdemeanors, and any other matter that was resolved by a plea of nolo contendere (no contest)", (3) omitting the reporting of minor traffic violations that resulted in a fine of \$300 or less; any offense committed before your 16th birthday; and to add Federal Youth Corrections Act or similar state laws to the list of expunged records.

- Modify question 2 to read "Are you now under charges, on trial, or awaiting trial on criminal charges for any violation of law such as a misdemeanor or a felony?"

These modifications to the criminal background questions are being proposed to be consistent with questions asked of applicants for all federal government employment.

Research Assistant Candidate Survey of Interests (FR 28i)

The Federal Reserve proposes to revise the FR 28i by (1) updating the list of software packages and statistical languages used by candidates, and (2) adding an "Other" section for RA candidates to write-in their research topics of interest. The information collected on the revised FR 28i would be used to better assess the qualifications and suitability of job candidates for RA positions.

Time Schedule for Information Collection

The Application is event generated and must be completed and submitted to the Board of Governors of the Federal Reserve System by all applicants.³ Only candidates for RA positions in the economic research divisions submit the FR 28i along with the Application.

Consultation Outside the Agency

On July 24, 2014, the Federal Reserve published a notice in the *Federal Register* (79 FR 43045) requesting public comment for 60 days on the extension, with revision, of the Application for Employment with the Board of Governors of the Federal Reserve System. The comment period for the notice expired on September 22, 2014. The Federal Reserve did not receive any comments. On October 1, 2014, the Federal Reserve published a final notice in the *Federal Register* (79 FR 59263), implementing the revisions as proposed.

Sensitive Questions

This collection of information contains no questions of a sensitive nature, as defined by OMB guidelines.

Legal Status

The Board's Legal Division has determined that the Application (including the two supplemental questionnaires) is required to obtain the benefit of Board employment. It is authorized pursuant to Sections 10(4) and 11(1) of the Federal Reserve Act, which provide the Federal Reserve Board broad authority over employment of staff. 12 U.S.C. §§ 244 and 248(1). Information provided on the Application (including the two supplemental questionnaires) will be

³ Additional Information about Applying for a Career at the Board:
<http://www.federalreserve.gov/careers/addInfo.htm>

kept confidential under exemption (b)(6) of the Freedom of Information Act (FOIA) to the extent that the disclosure of information “would constitute a clearly unwarranted invasion of personal privacy.” 5 U.S.C. § 552(b)(6). For example, the release of information such as an applicant’s date of birth, address, phone number, and personal information regarding any references provided would likely constitute a clearly unwarranted invasion of personal privacy, and would be kept confidential. However, the release of information such as the educational and professional qualifications of applicants would not likely constitute a clearly unwarranted invasion of personal privacy and would not be kept confidential.

Estimate of Respondent Burden

As shown in the following table, the current annual burden is estimated to be 3,558 hours. The estimated number of respondents is based on the average number of Applications (FR 28, FR 28s, and FR 28i) submitted over the last two years. The FR 28 is estimated to take an average of one hour to complete. The FR 28s is completed on a voluntary basis and is estimated to take an average of one minute to complete. The FR 28i is completed only by RA candidates and is estimated to take less than five minutes to complete. The Federal Reserve believes the proposed revisions would have no effect on the ongoing annual burden for the Application and would remain unchanged from current estimates and averages. These reporting requirements represent less than 1 percent of total Federal Reserve System paperwork burden.

	<i>Estimated number of respondents</i>	<i>Annual frequency</i>	<i>Estimated average hours per response</i>	<i>Estimated annual burden hours</i>
FR 28	3,500	1	1 hour	3,500
FR 28s	2,000	1	1 minute	33
FR 28i	300	1	5 minutes	<u>25</u>
<i>Total</i>				3,558

Based on a rate of \$23 per hour, the estimated current annual cost to the public of this information collection is \$81,834.⁴

Estimate of Cost to the Federal Reserve System

The total annual cost to the Federal Reserve for printing and processing the Application is estimated to be \$175,000.

⁴ The average consumer cost of \$23 is estimated using data from the BLS Economic News Release (USDLE-12-0549)