

3206-0248 SUPPORTING STATEMENT

OPM Form 1655 – Application for Senior Administrative Law Judge

OPM Form 1655-A – Geographic Preference Statement for Senior Administrative Law Judge Applicant

Justification:

1. Explain the circumstances that make the collection of information necessary.

Title 5 U.S.C. § 3323(b), 5 CFR 930.209, and 5 CFR 230.204(b) describe the Office of Personnel Management's (OPM) role in managing the Senior Administrative Law Judge (ALJ) Program, and define the rules and regulations that govern the program. This program allows retired ALJs to be reemployed as Senior ALJs to hear and decide agency cases in a variety of subject matters. OPM currently maintains a Senior ALJ Master List of approximately 192 retired ALJs who are available to serve as Senior ALJs. They are required to submit an application for reemployment and proof of licensure and to answer a series of questions regarding geographic and personal preferences.

2. Indicate how, by whom, and for what purpose the information is to be used. Except for a new collection, indicate the actual use the agency has made of the information received from the current collection.

OPM Form 1655 is an application form used to capture the necessary information required for reemployment as a Senior ALJ. The creation of this form streamlined the application process for the Senior ALJ position by allowing the retired judges to place all of their requested information on these tailored forms. In addition, it allows for easier data entry, and eliminated the need for further contact with Senior ALJ applicants for additional information.

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.

Improved information technology will do little to reduce the burden. The information collected cannot be obtained from other sources. The forms are available on the OPM website and are downloadable in a PDF format.

4. Describe efforts to identify duplication. Show specifically why any similar information already available cannot be used or modified for use for the purpose described in Item 2 above.

The forms are filed individually. Duplication is minimized.

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

This collection of information does not affect small businesses or other small entities.

6. **Describe the consequence to Federal program or policy activities if the collection is not conducted or is conducted less frequently, as well as any technical or legal obstacles to reducing burden.**

Senior ALJs hear and decide cases involving a variety of subject matters. According to 5 CFR 930.209, they must be deemed qualified to serve as a Senior ALJ as defined by OPM regulations. Insufficient collection of information could result in noncompliance with law and regulation.

7. **Explain any special circumstances that would cause an information collection to be conducted in a manner:**

- requiring respondents to report information to the agency more often than quarterly;
- requiring respondents to prepare a written response to a collection of information in fewer than 30 days after receipt of it;
- requiring respondents to submit more than an original and two copies of any document;
- requiring respondents to retain records, other than health, medical, government contract, grant-in-aid, or tax records, for more than three years;
- in connection with a statistical survey, that is not designed to produce valid and reliable results that can be generalized to the universe of study;
- requiring the use of a statistical data classification that has not been reviewed and approved by OMB;
- that includes a pledge of confidentiality that is not supported by authority established in statute or regulation, that is not supported by disclosure and data security policies that are consistent with the pledge, or which unnecessarily impedes sharing of data with other agencies for compatible confidential use; or
- requiring respondents to submit proprietary trade secrets, or other confidential information unless the agency can demonstrate that it has instituted procedures to protect the information's confidentiality to the extent permitted by law.

Not applicable. These forms do not meet criteria listed under item 7.

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

On August 1, 2014, a 60 Day Federal Register Notice was published at 79 FR 44872. No comments were received.

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

Not applicable. Individuals voluntarily complete these forms.

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

OPM Form 1655 and OPM 1655-A contain a Privacy Act Statement.

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. This information collection does not include questions are not of a sensitive nature, such as sexual behavior and attitudes, religious beliefs, and other matters that are commonly considered private.

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

Approximately 150 OPM 1655 forms, and approximately 200 OPM 1655-A forms are completed annually. The OPM 1655 form takes approximately 30 - 45 minutes to complete. The OPM 1655-A form takes approximately 5 - 25 minutes to complete. The annual estimated burden for the OPM 1655 and OPM 1655-A is 94 hours and 67 hours, respectively.

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

There is no cost to individual respondents.

14. Provide estimates of annualized cost to the Federal Government.

\$59,219.

15. Explain the reasons for any program changes or adjustments reported on the burden worksheet.

Not Applicable.

16. For collections of information whose results will be published, outline plans for tabulation and publication. Address any complex analytical techniques that will be used. Provide the time schedule for the entire project, including beginning and ending dates of the collection of information, completion of report, publication dates, and other actions.

Not applicable. Information collected on the forms will not be 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.

Since we cannot always reprint the whole supply of forms to change the OMB clearance expiration date, we seek approval not to display the date on the form.

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

There are no exceptions to the certification statement.

B. Collection of Information Employing Statistical Methods

This information collection does not employ statistical methods.