

SUPPORTING STATEMENT – PART A

Employment Applications (0702-XXXX)

A. JUSTIFICATION

1. Need for the Information Collection

This information collection request covers the documentation related to the employment of individuals to the Army and Air Force Exchange Service (Exchange) within the Continental United States of America (CONUS) and Exchange facilities outside the Continental United States (OCONUS). The collection allows the Exchange to capture the essential information required to evaluate applicants for Exchange civilian opportunities in order to hire the best, qualified individuals empowering the Exchange's mission of enhancing the quality of life for members of the United States Military.

The collection of personal information from individuals of the public for use in Exchange employment opportunities is authorized by Title 10 U.S.C. §3013, "Secretary of the Army," Title 10 U.S.C. §8013, "Secretary of the Air Force", Army Regulation 215-8/AFI 34-211(I), "Army and Air Force Exchange Service Operations," and Executive Order 9397 (SSN), as amended.

2. Use of the Information

The primary purpose of this information collection is to gather all the necessary data and qualifications from individuals at the time of his or her application for employment. This information is used by Exchange hiring managers in the decision of choosing the right individual for open job opportunities. Applications are submitted to the Exchange either by electronic means or manually through a Local National (LN) application. Information collected on applications varies based upon the nature of the position applied for or if the position is located in a foreign country.

Exchange Form 1200-038 "Employment Reference Request" was previously reported in our notice for public comment. Upon further consultations with the Exchange Human Resource management, it has been determined this form is no longer used and will not be listed further in this supporting statement.

Applications for job opportunities within the CONUS region are submitted to the Exchange through a third party web-based system provided through First

Advantage. This system is available through the Exchange website at <https://shopmyexchange.com> under “Exchange Careers” or by visiting <http://www.applymyexchange.com>. The system tracks, manages and interacts with the applicant who is seeking employment consideration. Individuals submit application materials, including contact information, social security number, cover letters, resumes, school transcripts, reference letters and a list of references. This web-based system provides instructions to the applicants when they press the “help” function on any screen. Individuals without access to a computer may apply by using a system at their local Exchange. Screen shots of what the individual views when providing information is included as an attachment to this supporting statement.

Individuals interested in applying for employment opportunities as an Exchange Driver are also required to complete Exchange Form 1200-026 “Driver’s Supplemental Information”. At the time of our submission for public comment, we believed that this form was no longer utilized. Upon further inquiries with our Logistics directorate, we determined Form 1200-026 is still collecting information from individuals who are interested in motor vehicle operator positions with the Exchange. For verification and security purposes all driver applicants must provide a copy of their driving record for the past (7) years which includes the following information: status of driver’s license, traffic accidents, driving record points, traffic law violations, convictions and fines, Driving Under the Influence (DUI) public records, whether their driver’s license is valid, denied, suspended, revoked or cancelled, and permits or privileges. Additionally, they must provide information on the last seven (7) years of past residential address and criminal background information

Applications for Exchange jobs as Local Nationals (LN) in OCONUS areas are manually completed. Individuals submit the appropriate application form for the geographical area for which the individual wishes to work. Individuals who apply for LN positions must agree to be compliant with any local treaties or arrangements between the United States of America and the host country. Completed application forms are then forwarded to the correct Exchange management hiring authority for review. The following forms are used for collection purposes in the OCONUS region.

- **Germany**; Individuals complete the Exchange-Europe Form 1200-718 entitled “Local National Employment Application – German Only”. This form collects personal information including the individual’s name, home address and phone number, citizenship, residence dates, education, conviction history and work history.

Note: the following forms were discovered after our submission for public comment relative to applications of employment.

- **Turkey;** Individuals complete the Exchange OCONUS form entitled “Exchange Army and Air Force Exchange Service AAFES-Turkey Application for Employment”. This form is used as a means to hire LN’s in the Turkey area for unique situations such as for the Tactical Field site in remote locations or to fulfill legal disability quota. This application form collects personal information which includes the individual’s name, address, telephone number, data and place of birth, age, sex, color of eyes and hair, height and weight, marital status, mother and father’s names, children’s names, education institutions, foreign languages spoken, employment history, reference names and contact information, physical condition, police records, military status and names of relatives working at the same location for which the individual is applying for a position.

- **Italy;** Individuals complete the Exchange OCONUS form entitled “Employment Application for External Candidates”. Individuals who are presented an application form will also be presented a memorandum with instructions on completing the form and a listing of additional documents to provide as part of their application. This form collects personal information which includes the individual’s name, address, data and place of birth, e-mail address, phone number, citizenship, ID or passport number, type of driver’s license, reference names and contact information, names of relatives working for the United States government, education information, the individual’s language proficiency, employment history, and military history. A copy of this declaration in Italian is attached with the application. Additional documents provided by the individual may include a copy of their Italian ID card, a passport picture, a copy of the “codice fiscale” or tax code, copy of educational diplomas or certificate of attendance, copies of any special licenses, and a copy of their military discharge papers if applicable.

Italian applicants who do not have passports must complete a “Declaration” stating they wish to be hired as a local citizen. This declaration is part of the application attached and is only available in Italian.

- **United Kingdom (UK);** Individuals complete the Exchange OCONUS form entitled “Initial Application for Local National Employment with the Army and Air Force Exchange Service (AAFES)”. Individuals are presented application directions as the first page of the application. These directions lead individuals to the web-based application format except for positions as LNs. The LN application collects personal information which includes the individual’s name, data of birth, home address, e-mail address, phone number, mobile number, citizenship, ability to obtain a driver’s license, passport and visa information, names of other relative working for the Exchange, educational and work history, criminal records, medical information which may affect work restrictions, and personal references including names and contact information.

Applications for specific positions are reviewed by the hiring manager. Should the individual be hired, their application is placed within their Official Personnel File (OPF). Applications for individuals who are not offered a position are maintained for a period of six months and then removed from the electronic system. LN applications are destroyed by shredding.

3. Use of Information Technology

Ninety-Nine Percent (99%) of applications received by the Exchange are submitted electronically. LN applications do not currently use an electronic hiring solution and therefore are manually completed and submitted to the local Human Resource authority. Electronic submissions are only used for CONUS job opportunities.

The web-based application allows individuals easy access to job opportunities with the Exchange. The system allows the individual to set up job alerts so they may be notified by e-mail of any new employment opportunities. Individuals can access the system on a 24-7 basis, 7 days a week. The system provides the individual with the status of the processing of their application, allows editing of information already provided, and provides all job related criteria. The individual may apply for more than one job at a time, keep their resume active for future opportunities, or may choose to delete everything, including their profile information. The individual's burden of time is dramatically reduced from the amount of time it would take to complete and submit a hard copy application form.

Utilization of this system permits the Exchange to reach more qualified applicants, obtain faster background checks, and hire the best qualified associate. Qualified hiring authorities have immediate access to application information for interview purposes. Information and data is readily available for disclosure to the individual or his/her designee upon request pursuant to the Privacy Act of 1974, as amended.

4. Non-Duplication

This specific information is not available from other sources as it is collected only at the time of the application.

5. Burden on Small Business

The collection of information does not have an impact on small businesses or other entities.

6. Less Frequent Collection

Information is collected from members of the public at their request when applying for open job opportunities with the Exchange. Collection is “as needed” or “on occasion”. Less frequent collection is not possible.

7. Paperwork Reduction Act Guidelines

No special circumstances exist that require collection to be conducted in a manner inconsistent with the guidelines delineated in Title 5 CFR 1320.5(d) (2).

8. Consultation and Public Comments

a. A notice of proposed collection was published in the Federal Register on January 7, 2015, 80 FR 867. No comments were received.

b. A 30-day notice of collection was published in the Federal Register on September 29, 2015, 80 FR 58470. No comments were received.

c. Significant input and information was received from the Exchange Human Resource directorate in relation to the continued use and burden relative to collection of information. It was determined that information is only maintained in one database and used accordingly as outlined in section 2 of this statement.

9. Gifts or Payment

No payments or gifts will be provided to the respondents.

10. Confidentiality

The information is protected under the Privacy Act of 1974, as amended. Respondents are assured confidentiality through Privacy Act Statements on the applicable collection documents or verbally by an HRM. Access to information collected is restricted only to authorize Exchange personnel who have been screened, cleared for access, and have a role-based position which places them in an arrangement which requires servicing, reviewing or updating the record. Physical entry is restricted by the use of locks, guards, and passwords or other administrative procedures.

Disclosure of respondent information is made upon submission of the individuals' original, notarized, written request for documents either disclosed to

themselves or to a third party representative. Other disclosures may be made to law enforcement authorities for investigatory purposes or through the routine uses disclosures as authorized by statute. A draft copy of the altered SORNs is provided.

The Exchange will provide the Agency Disclosure Notice, the Privacy Act Statement (PAS) and Instructions as a coversheet to each OCONUS employment application. Web-based applicants will be provided a link to review the same information prior to completion of the application. If Social Security Number is requested and provided it is authorized under attached DoDI 1000.30 Enclosure 2 sections 2.c.(2), (3), (5) and (8).

The enclosed Privacy Impact Assessment (PIA) was completed by the Exchange in July 2013 in reference to this electronic collection of information. This PIA is in association with the Exchange APMS Portfolio located in the DoD Information System Register (DITPR) Number 15980 (DA 301730) and may be viewed at <http://ciog6.army.mil/Portals/1/PIA/2013/EXHRM-TMG.pdf>.

The records retention of the electronic application and the hard copy applications are maintained for a period of six months if the individual is not hired for the applied position. Applications for individuals who are hired as Exchange employees are maintained in the individual's official personnel file during the course of their employment with the Exchange. Upon the separation of the employee, the file will be transferred to the National Personnel Records Center (NPRC) in Valmeyer, IL and maintained for an additional 65 years.

11. Sensitive Questions

Respondents may be asked to provide their social security number, age, height, weight, social security number, race, ethnicity, and possible physical behavioral attitudes or lifestyles, and medical history. These items may be used by medical providers or law enforcement entities in their treatment or investigation into background history. The collection is authorized by DoD 5400.11-R, C4. Justification for use of the SSN is provided.

12. Respondent Burden and its Labor Cost

a. Estimation of Respondent Burden

The average annual burden estimate for reporting and recordkeeping requirements were derived from estimates from the Human Resource directorate based

upon the history of obtaining applicant information. The below reported numbers varies from our notice of public comment due to newly found forms and data.

It is estimated the Exchange collects approximately 72,770 electronic applications and an estimated 620 manual LN applications per year. Each application only requires one response.

Application Type	Estimate Annual Receipts	Estimate Average Burden Hours
Electronic Submission	72,770	30 Minutes
LN Applications	620	1 Hour
TOTAL	73,390	45 Minutes

- Number of Annual Respondents = 73,390
- Number of Responses per Respondent = 1
- Number of Annual Responses = 73,390
- Response Time = 45 Minutes
- Total Annual Burden Hours = 55,043
- Information Frequency = On occasion

b. Labor Cost of Respondent Burden

Each respondent is estimated to spend about 45 minutes of time completing the application process. Using the United States Department of Labor Wage and Hour Division's Federal Minimum wage of \$7.25/hour (July 24, 2009), it is estimated the cost per response is \$5.44 resulting in an annual total labor cost to respondents of \$399,242.

- Number of Annual Respondents = 73,390
- Number of Responses per Respondent = 1
- Number of Annual Responses = 73,390
- Response Time = 45 minutes
- Avg. Labor Cost per Response based upon current minimum wage = \$5.44
- Total Annual Labor Cost to Respondents = \$399,242
- Information Frequency = On occasion

13. Respondent Costs Other Than Burden Hour Costs

There are no capital or start-up costs associated with this information collection.

14. Cost to the Federal Government

The estimated costs for the required recordkeeping and reporting activities were derived from consultations with the Human Resource Directorate. It is estimated the Exchange utilizes the human resource associates across the word as well as those located at the HQ Exchange. This amounts to an approximately 91 associates with an average salary of \$24.00 per hour. (NAF Wage Schedule – 152 Dallas, TX Effective 04 Jan 2014.) It is estimated that an HR associate takes an average of 30 minutes to confirm or accept an application.

- 91 – Number of personnel who dedicate time to collecting/processing information collected from the respondent.
- 73390 = Number of annual responses.
- 30 Minutes = Time in hours per response to collect/process the information collected; including time for refining, interpreting, analyzing and documenting the information received.
- \$24.00 = Average salary of the individuals who collect and process the information collected.
- \$12.00 = Average cost per response.
- $73,390 \times 12.00 = \$880,680$ = Annual burden cost.

This is an existing system of records. Start-up costs cannot be estimated. Maintenance to this system includes an average salary of IT System Support Team, the burden cost to the Exchange, the basic recruiting cost and the assessment services. The cost of continuance using this system was directed from consultations with the Exchange HR System managers.

- Annual cost to the federal government:
 $\$880,680$ (Burden) + $\$299,975$ (Recruiting Cost) + $\$200,000$ (Assessment Services) = $\$1,380,655$. Wage cost consistent with NAF Wage Schedule – 152 Dallas, TX Effective 04 Jan 2014.

15. Reasons for Change in Burden

This is an existing collection in use without an OMB Control Number.

16. Publication of Results

There are no plans to publish the results of this collection.

17. Non-Display of OMB Expiration Date

There is no request for approval to omit the display of the expiration date of the OMB approval on the instrument.

18. Exceptions to “certification for Paperwork Reduction Submissions”

No Exceptions