

SUPPORTING STATEMENT
U.S. Department of Commerce
U.S. Census Bureau
Form BC-170, Census Employment Inquiry
OMB Control No. 0607-0139

A. Justification

1. Necessity of Information Collection

The BC-170A, B and D are the forms the Census Bureau uses to collect information from job applicants such as personal data and work experience. 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 Census Bureau requests the Office of Management and Budget (OMB) to review proposed changes to the BC-170D only. The Census Bureau needs to make changes to this form due to new procedural modifications for selecting and hiring field staff, and to implement the BC-170D into an online job application system. The BC-170A and BC-170B do not require the changes made to the BC-170D. The OMB has already provided the Census Bureau continued use approval of the BC-170A and BC-170B forms that expires on 2/28/2018.

The Census Bureau uses the three BC-170 forms throughout the censuses and intercensal periods for the special census, one time or recurring survey operations and other decennial pretests. The BC-170A is used when applying for temporary/permanent office and field positions (clerks, field representatives, supervisors) on a recurring survey, such as the Current Population Survey (CPS), in one of the Census Bureau's six Regional Offices (ROs) throughout the United States. The Form BC-170B is used for special censuses for temporary field and office positions (enumerators, clerks, supervisors). The Form BC-170D is for census related positions and used to apply for temporary jobs in office and field positions (clerks, enumerators, recruiting assistants, supervisors). The forms are designed to collect specific data needed based on the nature of the operation.

The use of these forms are 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. These forms meet the Census Bureau needs for collecting minimum information to hire temporary workers and are less burdensome to candidates applying for temporary census field jobs than the application process for a permanent position.

The changes made to the BC-170D synchronize the paper form with the development of an online job application process and support the changes made to the selection and hiring processes for related positions. Specific changes include:

1. Adding a Prior Work Experience section to collect information about prior work experience.
2. Removing background information that was previously collected at the time of application such as - convictions, imprisonment, probation, or parole in the last 7 years; convictions by a military court-martial in the past 7 years; current charges for any violation of the law; firings from any job for any reason, quitting after being told that you would be fired, leaving any job by mutual agreement because of specific problems, or debarred from federal employment by the Office of Personnel Management or any other federal agency during the past 5 years; and delinquency on any federal debt.

The Census Bureau is changing the procedures for hiring candidates for Decennial Census tests and 2020 Census jobs. The Census Bureau no longer requires applicants to answer background questions at the time they complete the BC-170D. Instead, the applicant first submits his or her application and the responses to the skills assessment questions. Then, if the application is processed successfully, the applicant will send his or her fingerprints along with the background question answers collected from the OF-306, *Declaration for Federal Employment*, to the Census Bureau so that we can conduct a thorough background check.

3. Creating an optional section on the form for questions which are needed for research and evaluation purposes, but not necessary for selection purposes. The optional section will collect the applicant's level of education and how the applicant found out about the job.
4. Adding questions to gain more detail about current Federal, State, Local, or Tribal government employment, which could pose a conflict of interest with census jobs.
5. Adding categories to clarify the type of work that an applicant might be interested in.
6. Clarifying and updating instructions on the cover pages of the form and item specific instructions, and the Privacy Act statement.
7. Reformatting/rewording questions/items for clarification purposes.
8. Formatting of questions for collection on a paper form and electronic online job application.

In the initial Federal Register notice describing proposed changes to the BC-170D (Document number 2015-28704 of the Federal Register under section I), Item #3 above indicated that the form would collect the following- "... information to help determine whether applicants may be willing and/or able to use their personal smartphone for work." This information will no longer be necessary to collect because it is no longer required for operations.

All three forms are attached (Attachments 1, 2 and 3). Also included are the BC-170D Electronic Mock Ups (Attachment 4).

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

2. Needs and Uses

Job applicants complete the BC-170 (A, B, or D) 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.

Information quality is an integral part of the pre-dissemination review of the information disseminated by the Census Bureau (fully described in the Census Bureau's Information Quality Guidelines). Information quality is also integral to the information collections conducted by the Census Bureau and is incorporated into the clearance process required by the Paperwork Reduction Act.

The Census Bureau intends to start using the revised BC-170D form on September 1, 2016.

3. Use of Information Technology

The BC-170A and the BC-170B are currently available via electronic file for interested applicants to complete the form online and to print the application for submission. The changes made to the BC-170D have been made to help make the form more compatible with collection of information using an online job application process.

4. Efforts to Identify Duplication

The BC-170 (A, B and D) are intended to facilitate speedy hiring and selection in situations requiring large numbers of employees for assignments of a limited duration or on recurring surveys. Accordingly, the use of the BC-170 will be limited to situations that 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 updated forms request the minimum information necessary to hire temporary workers and are less burdensome to candidates applying for a permanent position.

6. Consequences of Less Frequent Collection

Completion of this form is a one-time collection.

7. Special Circumstances

There are no special circumstances.

8. Consultations Outside the Agency

The Census Bureau's Human Resources Division has consulted, on an ongoing basis since 1984, with the Office of Human Resource Management at the Department of Commerce. Since that time, several revisions to these forms 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.

The Census Bureau published a notice in the Federal Register on November 12, 2015 (volume 80, pg. 69936). The Census Bureau received one comment on December 29, 2015.

The comment was from Ms. Lisa Schnall, Senior Attorney Advisor at the Equal Employment Opportunity Commission (EEOC), requesting copies of forms BC-170A, BC-170B, and BC-170D, as well as the supporting statements. We sent the requested forms to Ms. Lisa Schnall via email and we have not received any feedback since we sent the requested information other than a thank you reply.

9. Paying Respondents

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 first page of each of the forms. This confidentiality notice also appears on the website with the online collection of data on the BC-170D. Completion of the forms is required by applicants in order to receive consideration for employment.

11. Justification for Sensitive Questions

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.

12. Estimate of Hour Burden

Respondents complete the BC-170 only once. We expect approximately 70,000 responses per year. Based on previous experience, the BC-170 takes an average of 15 minutes to complete. The annual burden would be 17,500 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 \$157,500. The cost is budgeted for and paid for by the Bureau of the Census.

15. Reason for Change in Burden

The Census Bureau is conducting several Decennial Census tests, such as the 2017 Census test, where we expect an increased number of candidates applying for the several temporary vacancies in the test sites. This increase in the expected number of applicants using this form increased the burden hours by 1,250 burden hours, for a total of 17,500 burden hours.

16. Project Schedule

The BC-170 (A, B and D) is used throughout the census and intercensal periods for the special censuses and decennial pretests for short-term time limited appointments. In addition, it is estimated that the Census Bureau will be conducting many special censuses for state and local governments annually continuing through 2018. Recruiting will be an ongoing program throughout the current survey data collection operations as well as the decennial pretests.

17. Request not to Display Expiration Date

Since the BC-170 is used frequently and does not change often we request permission to not display the expiration date 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
4. Electronic BC-170D Mock-up Screens