

March 17, 2016 - Non-Substantive Changes

There are two changes to the form:

- One is the addition of 2 yes/no acknowledgment questions on page 2 – questions #23 and 24.
- The other is that the numbering of the questions on page 2 had to be corrected – there were previously two number 3 and two number 16.

We believe that these changes are non-substantive because they are yes/no questions simply asking the sponsoring agency to acknowledge these requirements. Per 5 CFR 1320.3(h), one of the categories that is not deemed a collection of information and is therefore exempt from the PRA:

“Affidavits, oaths, affirmation, certifications, receipts, changes of address, consents, or acknowledgements.” – and to ask the user to check yes/no to acknowledge these questions has already been recognized, according to the statute above, as not putting any substantial burden on the persons completing the form.