# FINAL SUPPORTING STATEMENT FOR NRC FORM 212, "QUALIFICATIONS INVESTIGATION PROFESSIONAL, TECHNICAL, AND ADMINISTRATIVE POSITIONS" 3150-0033

# EXTENSION

#### **Description of the Information Collection**

The NRC Form 212 is sent to former employers, supervisors, and other references indicated on job applications as a part of the investigation for suitability of external candidates for appointment to professional, technical and administrative positions in the U.S. Nuclear Regulatory Commission (NRC). The information obtained on NRC Form 212 is reviewed and evaluated by personnel of the Office of the Chief Human Capital Officer (OCHCO) in determining the qualifications of applicants for employment.

The form provides questions that are designed to prompt the responder to engage in a meaningful discussion for all positions and reduces the number of references required to support a hiring decision.

#### . JUSTIFICATION

#### 1. <u>Need for and Practical Utility of the Collection of Information</u>

Information requested on NRC Form 212 is used to determine the qualifications and suitability of applicants for employment in professional, technical, and administrative positions with the NRC. The completed form may be used to examine, rate and/or assess the prospective employee's qualifications. The information regarding the qualifications of applicants for employment is reviewed by professional personnel in OCHCO, in conjunction with other information in the NRC files, to determine the qualifications of the applicant for appointment to the position under consideration.

#### 2. <u>Agency Use of Information</u>

The NRC Form 212, "Qualifications Investigation, Professional, Technical, and Administrative Positions" is used for investigating the qualifications of external candidates for appointment to professional, technical, and administrative positions in the NRC.

# 3. <u>Reduction of Burden Through Information Technology</u>

There are no legal obstacles to reducing the burden associated with this information collection. The NRC encourages respondents to use information technology when it would be beneficial to them. The non-recurrence of each individual collection makes it difficult to reduce the burden through the use of technology. However, the NRC encourages the respondents to use any innovative technology which would reduce burden. It is estimated that approximately (0%) of the potential responses are filed electronically.

## 4. Effort to Identify Duplication and Use Similar Information

No sources of similar information are available. There is no duplication of requirements.

### 5. Effort to Reduce Small Business Burden

Information may be requested from individuals associated with small businesses; however, the amount of information requested is kept to a minimum while still allowing a full investigation.

6. <u>Consequences to Federal Program or Policy Activities if the Collection Is Not</u> <u>Conducted or Is Conducted Less Frequently</u>

This information has to be collected and reviewed prior to making a decision on employment eligibility.

### 7. <u>Circumstances Which Justify Variation from OMB Guidelines</u>

This request does not vary from OMB guidelines.

8. <u>Consultations Outside the NRC</u>

Opportunity for public comment on the information collection requirements for this clearance package was published in the Federal Register on August 3, 2016 (81 FR 51216). In addition, we contacted seven employers (Nuclear Energy Institute, NASA Goddard, University of Connecticut, University of Maryland, Federal Energy Regulatory Commission, Minnesota State Lottery, and Brigham Young University) as part of the public consultation process via telephone. No comments were received.

9. <u>Payment or Gift to Respondents</u>

Not Applicable.

## 10. <u>Confidentiality of Information</u>

Confidential and proprietary information is protected in accordance with NRC regulations in Title 10 of the *Code of Federal Regulations* (10CFR) 9.17(a) and 10 CFR 2.390(b).

To maintain the privacy of applicants, completed NRC Form 212s are maintained in locked filing cabinets and destroyed within the Office of the Chief Human Capital Officer.

11. <u>Justification for Sensitive Questions</u>

Not applicable.

12. Estimated Burden and Burden Hour Cost

Past experience indicates that it takes about 30 minutes to complete a form. The total estimated burden for the approximately 1,000 forms received annually is 500 hours (.5 hours x 1,000 forms). The estimated annual cost is \$134,000 (500 hours x \$268/hour).

13. <u>Estimate of Other Additional Costs</u>

There are no additional costs.

14. Estimated Annualized Cost to the Federal Government

The total estimated annual cost to the Federal Government for printing, handling, reviewing, and assessing the NRC Form 212 is 134,000 (500 hours (1,000 x .5/hours) x 268/hour).

15. Reasons for Changes in Burden or Cost

The fee rate has increased from \$257 per hour to \$268 per hour.

This extension package reflects a consistent number of forms projected to be received by the NRC and no change in the burden for the next three-year clearance period.

16. <u>Publication for Statistical Use</u>

This information is not published for statistical use.

17. Reason for Not Displaying the Expiration Date

The expiration date is displayed on the form.

- 18. <u>Exceptions to the Certification Statement</u> Not applicable.
- B. COLLECTION OF INFORMATION EMPLOYING STATISTICAL METHODS Statistical methods are not used in this collection of information.