

Supporting Statement for the Applications for Employment with the Board of Governors of the Federal Reserve System (FR 28; OMB No. 7100-0181)

Summary

The Board of Governors of the Federal Reserve System (Board), under delegated authority from the Office of Management and Budget (OMB), proposes to extend for three years, with revision, the Applications for Employment with the Board of Governors of the Federal Reserve System (FR 28; OMB No. 7100-0181). This family of reports is comprised of the following three reports:

- Application for Employment (FR 28)
- Applicant's Voluntary Self-Identification (FR 28s)
- Research Assistant Candidate Survey of Interests and Experience (FR 28i)

The FR 28 (the Application) is required to obtain a benefit and collects information to determine the qualifications and availability of applicants for employment with the Board. The FR 28 form collects information on education and training, employment record, military service record, and other information since the time the applicant left high school. The FR 28s form collects information on the applicant's gender, ethnicity, and race, while the FR 28i form collects information from candidates applying for Research Assistant (RA) positions on their level of interest in economics and related areas.

The Board proposes to revise the FR 28 and FR 28i with minor revisions to several fields as described in detail below. The Board does not propose any revision to the FR 28s. Copies of the draft FR 28 and FR 28i are included with this submission for review. The Board receives approximately 3,500 applications per year, solicited and unsolicited. The total annual reporting burden for the proposed FR 28 reports is estimated to be 3,608 hours, an increase of 50 hours from the current burden of 3,558 hours.

Background and Justification

The Application in its current format has been used for more than 20 years. Over the years, the Application has been modified to keep pace with changes in staffing requirements and to comply with laws that have been enacted or amended to protect the applicant and the information provided on the Application. Such laws include the Age Discrimination in Employment Act (29 U.S.C. 621 et seq.), the Civil Rights Act (42 U.S.C. 2000e-16), the Equal Pay Act (29 U.S.C. 206(d)), the Immigration Reform and Control Act of 1986 (8 U.S.C. 1324(a) and 1324(b)), the Privacy Act (5 U.S.C. 552a), and the Rehabilitation Act (29 U.S.C. 791 et seq.).

The Application may be used to examine, rate, or assess the applicant's¹ qualifications, to determine if the applicant is entitled to rights or benefits under certain laws and regulations, and to contact the applicant to arrange an interview. After Board staff evaluates an Application, the

¹ An applicant is any person who meets the published minimum qualifications for a specific position and has expressed interest in or been considered for that position.

applicant is either contacted for an interview or notified in writing that he or she does not qualify for any open positions.

In 2001, the Board implemented the Applicant's Voluntary Self-Identification (FR 28s) in order for an applicant to identify his or her gender, race, and ethnicity. The Board also implemented the Research Assistant Candidate Survey of Interests (FR 28i) which is used to better match an RA candidate's interests with the different research areas at the Board.

In December 2004, the FR 28 was revised to include the applicant's e-mail address and cell phone number. This information is used as an alternate source to contact applicants. In addition, the FR 28 was modified to inform applicants that educational claims must be from an accredited school. The FR 28s was modified to be consistent with the OMB's Statistical Policy Directive No. 15 (Race and Ethnic Standards for Federal Statistics and Administrative Reporting). The FR 28i was modified to update the areas of interest, change the rating scale format, add a section on software packages used by the candidate, and add a line for the candidate's name.

In 2007, the FR 28 was revised to delete the social security number question, expand the country of citizenship question in the case of non-citizens, add several criminal background questions, expand the Notes section to provide more detail about an applicant's rights and responsibilities, and revise the confidentiality status for and treatment of certain information provided on the Application. The FR 28i was revised to modify the areas of interest, add a more detailed section on software packages used by the candidate, add a section for the candidate's career objectives, and change the rating scale format of the survey.

In 2010, the FR 28i was revised to expand the list of research topics of interest to candidates, update the list of software packages and statistical languages used by candidates, and eliminate the portion of the survey that asks for the future objectives of the candidates from the report.

In 2016, the Board modified the FR 28 by creating an online submission system for the application for employment, adjusting the wording of questions on the FR 28 form to match what is in the online system, and adjusting the Race and National Origin self-identification question on the FR 28s to match OMB standards. Also, the FR 28s was modified to request citizenship, graduation date, and availability date on this form (assuming that the Board might not ask candidates to spend time and effort on completing the full application form), removing the rankings for individual areas of economic preferences and interest and now limiting it a description of the fields with candidates ranking their top three choices, and reducing the exhaustive list of statistical software packets and programming languages to a more limited categorical response with an option to list specific programs or programming languages (like SAS, Stata, Python, etc).

Description of Information Collection

The Board receives approximately 3,500 applications per year, both solicited and unsolicited, from members of the public who would like to be considered for employment at the Board. Since the applicant is usually either hired by the Board or finds other employment within the two years that the Board retains the Application, the applicant generally files the Application once.

The FR 28 is comprised of eight sections: (1) Background, (2) Education and Training, (3) Employment Record, (4) Military Service Record, (5) References, (6) General, (7) Remarks, and (8) Notes. The first six sections collect information on specific aspects of the applicant's qualifications. The Background section collects name, address, telephone, and citizenship information and the position for which the applicant is applying. The Education and Training section collects detailed information on the applicant's educational history and skills set. The Employment Record section collects a chronological summary of work experience. The Military Service Record section collects information on service branch, rank, duties, and discharge. The References section collects information on three references. The General section collects information on criminal records, discharge from employment, willingness to travel, and relations to or acquaintances with Board staff or officers and directors of financial institutions. The Remarks section provides the applicant an opportunity to provide further information regarding his or her qualifications. The Notes section explains what is required of the applicant prior to an interview and what may be required of the applicant if he or she is offered a position (for example, transcripts, medical examination, or drug test).

The FR 28s is comprised of four sections: (1) Name and Gender, in which the applicant is asked to check the box that corresponds to gender or check "I do not wish to disclose", (2) Position for which the applicant is applying, (3) Ethnicity Self-Identification, in which the applicant is asked to choose between "Hispanic or Latino," "Not Hispanic or Latino," or "I do not wish to disclose," and (4) Race Self-Identification, in which the applicant are asked to choose one or more among "American Indian or Alaskan Native," "Asian," "Black or African-American," "Native Hawaiian or Other Pacific Islander," "White," or "I do not wish to disclose." The Board uses this information to comply with federal equal employment opportunity (EEO) reporting and recordkeeping requirements, other legal requirements, and as an input to its self-analysis of hiring practices. Information collected on the FR 28s has no bearing on the determination of an applicant's job-related qualifications.

The FR 28i is comprised of three sections in which RA candidates are asked to rate their level of interest in categories of economics and related research areas, experience with various software packages and statistical programming languages, and interest in pursuing educational opportunities after leaving the Board. The FR 28i helps to streamline the recruitment process.

Proposed Revisions

Application (FR 28)

The Board proposes to revise the form by:

- adding fields in the employment history section for job type, shift, employee status, and desired compensation;
- adding fields in the education and training section for issue and expiration date for certifications and professional licenses;
- adding fields in the references section for relationship, type, and length of relationship with the reference; and
- adding fields in the submission section to allow for withdrawal of the application and a request for the applicant to provide a reason for withdrawal.

Research Assistant Candidate Survey of Interests (FR 28i)

The Board proposes to revise the FR 28i by adding a section to allow an open-ended response by applicants to describe how they have demonstrated attributes that are displayed by successful research assistants in the Economics Divisions.

Time Schedule for Information Collection

The FR 28 reports are event generated and must be completed and submitted to the Board's Management Division by all applicants.² Staff in the economic research divisions and the Legal Division distribute and collect the Application in their recruiting efforts. Only candidates for RA positions in the economic research divisions submit the FR 28i along with the Application.

Legal Status

The Board's Legal Division has determined that the Application (including the two supplemental questionnaires) is required to obtain the benefit of Board employment. It is authorized pursuant to sections 10(4) and 11(1) of the Federal Reserve Act, which provide the Board broad authority over employment of staff (12 U.S.C. 244 and 248(l)). Information provided on the Application (including the two supplemental questionnaires) will be kept confidential under exemption (b)(6) of the Freedom of Information Act (FOIA) to the extent that the disclosure of information "would constitute a clearly unwarranted invasion of personal privacy" (5 U.S.C. 552(b)(6)). For example, the release of information such as an applicant's date of birth, address, phone number, and personal information regarding any references provided would likely constitute a clearly unwarranted invasion of personal privacy, and would be kept confidential. However, the release of information such as the educational and professional qualifications of applicants would not likely constitute a clearly unwarranted invasion of personal privacy and would not be kept confidential.

Consultation Outside the Agency

On July 28, 2017, the Board published an initial notice in the *Federal Register* (82 FR 35202) requesting public comment for 60 days on the proposal to extend with revision the FR 28. The comment period for this notice expired on September 26, 2017. The Board did not

² Additional Information about Applying for a Career at the Board, www.federalreserve.gov/careers/addInfo.htm.

receive any comments. On October 25, 2017, the Board published a final notice in the *Federal Register* (82 FR 49370) and the revisions will be implemented as proposed.

Estimate of Respondent Burden

As shown in the following table, the current annual burden is estimated to be 3,558 hours. The estimated number of respondents is based on the average number of Applications (FR 28, FR 28s, and FR 28i) submitted over the last two years. Due to proposed revisions, the Board estimates no change in the estimated hours per response for the FR 28 and an additional 10 minutes per response for the FR 28i. This change results in an increase of 50 hours, for a proposed annual burden estimate of 3,608 hours. These reporting requirements represent less than 1 percent of the total Federal Reserve System paperwork burden.

	<i>Number of respondents³</i>	<i>Annual frequency</i>	<i>Estimated average time per response</i>	<i>Estimated annual burden hours</i>
Current				
FR 28	3,500	1	1 hour	3,500
FR 28s	2,000	1	1 minute	33
FR 28i	300	1	5 minutes	<u>25</u>
<i>Total</i>				3,558
Proposed				
FR 28	3,500	1	1 hour	3,500
FR 28s	2,000	1	1 minute	33
FR 28i	300	1	15 minutes	<u>75</u>
<i>Total</i>				3,608
<i>Change</i>				50

The total cost to the public for this information collection is estimated to increase from \$92,508 to \$93,808 with the proposed revisions.⁴

³ Of these respondents, none are considered small entities as defined by the Small Business Administration (i.e., entities with less than \$550 million in total assets) www.sba.gov/contracting/getting-started-contractor/make-sure-you-meet-sba-size-standards/table-small-business-size-standards.

⁴ The average consumer cost of \$26 is estimated using data from the BLS Economic News Release (USDLE-16-0462) www.bls.gov/news.release/cewqtr.nr0.htm.

Sensitive Questions

This collection of information contains no questions of a sensitive nature, as defined by OMB guidelines.

Estimate of Cost to the Federal Reserve System

The total annual cost to the Federal Reserve for printing and processing the FR 28 reports is estimated to be \$175,000.