

**SUPPORTING STATEMENT FOR
PAPERWORK REDUCTION ACT SUBMISSION
Foreign Service Officer Test Registration Form
OMB Number 1405-0008
Form DS-1998E**

A. JUSTIFICATION

1. The Foreign Service Officer Test Registration Form is the form used by all individuals who wish to register for the Foreign Service Officer Test. The collection of information is authorized by section 301(b) of the Foreign Service Act of 1980, as amended (22 U.S.C. § 3941(b)), which provides that the Secretary of State “[s]hall prescribe, as appropriate, written, oral, physical, foreign language, and other examination for appointment to the [Foreign] Service (other than as chief of mission or ambassador at large).” Information on race, national origin, and sex of applicants is collected in accordance with Title VII of the Civil Rights Act of 1964 as amended and Federal Sector Equal Employment Opportunities Regulations (29 C.F.R. § 1614.601). Collection of Social Security numbers is done pursuant to Executive Order 9397, which required federal agencies to use Social Security numbers “whenever [an agency head] finds it advisable to establish a new system of permanent account numbers pertaining to individual persons.” Information on disabilities is collected pursuant to 29 C.F.R. §§ 1614.601(a), (f), and (g); 29 C.F.R. §§ 1614.203(d)(6) – (8); Executive Orders 13078, 13163, and 13164; and the EEOC Management Directive 715, consistent with Sections 501 and 504 of the Rehabilitation Act of 1973, 29 U.S.C. §§ 791 and 794.
2. The information will be collected by Pearson VUE on behalf of the U.S. Department of State. Pearson VUE will collect the information via electronic form transfer. As is the case regarding information received from the current collection of information, the information collected will be used to register individuals for the Foreign Service Officer Test, to help improve future tests, and to conduct research based on the results of the test for test registrants, takers, and passers. The data collected will be used by the Department of State to collect generic applicant information.
3. The online registration form is accessible at www.pearsonvue.com/fsot/ (DS-1998E.) It is submitted via electronic form transfer; registration data is transferred into the contractor's master database.
4. Form DS-1998E will be used only to register for the Foreign Service Officer Test. The information collected is not a duplicate of information maintained elsewhere by or otherwise available to the Department.
5. This collection does not impact small businesses or other small entities.

6. The collection of information through the Foreign Service Officer Test Registration Form is vital for the recruitment of new Foreign Service Officers. This is the only form that may be used to register for the Foreign Service Officer Test, which is the first of the assessments that must be passed to be considered for employment as a Foreign Service Officer. The information collection is conducted in preparation for administering the Foreign Service Officer Test. The need to administer the test is dictated by the Department of State hiring needs.
7. There are no special circumstances regarding this information collection.
8. The State Department (Bureau of Human Resources) published a 60-day notice on January 30, 2018, requesting public comments. 83 FR 4394. The Department received two comments. The first comment posted on February 16, 2018 was not in reference to the Foreign Service Officer Test registration process. The second comment posted on February 16, 2018 warned the Department of potential risks “using an outsourced vendor including one potentially not stateside in dealing with US Citizen application information to be protected.” The Department’s FSOT contractor is the Human Resources Organization (HumRRO) and they partner with the company, Pearson VUE. Pearson VUE (HumRRO’s subcontractor), is ultimately owned by Pearson PLC, which is based out of London, England. The Department is fully aware of Pearson VUE’s testing operations around the world and does not find any vulnerabilities regarding cyber-security issues using the company. The central component of Pearson VUE’s test delivery technology is the Athena test driver, the software that presents test items to examinees securely, quickly, and accurately. Athena is a 32-bit Microsoft Windows application that runs under control of our Delivery Manager software to secure its operation and deliver our clients’ exams. Since Pearson VUE is an industry leader in testing security, the Board of Examiners believes that having them provide the FSOT at their test centers provides a significant benefit to the Department. Their Secure Testing Framework provides strict adherence to global data integrity and privacy standards, the most sophisticated tools for ensuring candidate identification, the most secure testing environments, and the best tools for monitoring program integrity through a global security team and data forensic tools. Their systems, facilities, and test centers are designed with program integrity.
9. The Department of State does not provide any payment or gifts to the respondents.
10. The Registration Form solicits information pursuant to the authority granted to the Secretary of State under the Foreign Service Act of 1980, as amended, and is governed by the applicable sections of the Privacy Act of 1974 (5 USC 552a) and the Freedom of Information Act (5 USC 552) as amended. There have been no other assurances of confidentiality.
11. This collection does not request information that would be considered sensitive.

12. The Bureau of Human Resources estimates that the average time required for this information collection is 2 hours per response. Therefore, the estimated total annual burden for the collection is: 12,000 (estimated number of respondents) x 2 (hours) = 24,000 hours per year. To estimate the cost to respondents based on hourly wage and weighted wage multiplier, the Department of State calculated the following: \$23.86 (mean hourly earning based on the estimated income per hour from the Bureau of Labor Statistics) x 1.4 (weighted wage multiplier) = \$33.40 weighted wage 12,000 (annual hours) x \$33.40 (weighted wage) = \$400,800.00 (hour burden cost). The estimated number of hours required per response is based on a sampling of the time required to search existing data sources, gather the necessary information, provide the information required, review the final collection, and submit the collection to Pearson VUE for processing.

13. There is no cost to the applicant to complete this form.

14. The design of the Foreign Service Officer Test Registration Form and the development and administration of the Foreign Service Officer Test have been contracted out to Human Resources Research Organization (HumRRO) and its subcontractor Pearson VUE. The following costs are based on the statements that HumRRO has provided the United States Department of State regarding the form.

The estimated annualized cost to the federal government is \$162,533. The initial cost to create the registration form is estimated at \$339,200. The estimated cost to update the registration form and maintain the system is approximately \$74,200 per year for the second and third years. Annualizing these costs equals \$162,533 ($\$339,200 + \$74,200 + \$74,200 = \$487,600 / 3 = \$162,533$).

15. There was a decrease of 20,000 respondents from the number of respondents reported at the last renewal of this collection. There are now an estimated 12,000 respondents registering for the Foreign Service Officer Test resulting in a corresponding decrease in burden hours. There has been a decline in the number of candidates registering for the FSOT.

16. The data gathered by this collection will not be published.

17. The Department will display the expiration date for OMB approval of the information collection.

18. The Department is not requesting any exception to the certification statement.

B. COLLECTION OF INFORMATION EMPLOYING STATISTICAL METHODS

1. The Department of State is only concerned with those individuals who submit the registration form; non-respondents are of no concern.

2. The Department of State uses the information from the registration material to assess the effectiveness of its recruitment process. Demographic data, schools and other registrant information are analyzed to assess the recruitment effort in the past year, as well as to project the recruitment effort that is needed for the future. This statistical analysis is critical to the ongoing development of the recruitment strategy and the assessment of the recruitment process to achieve the goals and objective of the United States Department of State Five Year Recruitment Plan. We have not had to use sampling procedures; all results of our data collected can be described as reliable data.
3. Non-response is not an issue because the only way an applicant can take the Foreign Service Officer Test is to complete this test registration form.
4. Policy procedures already in place and have been tested previously.
5. HumRRO will be collecting the statistical data on behalf of the United States Department of State. The chief contact at HumRRO on the statistical process is Deborah L. Whetzel, project director, reachable at (703) 706-5605.