

## **Supporting Statement for Paperwork Reduction Act Submission**

### **Reinstatement of Standard Form (SF 15)**

Under the provisions of the Paperwork Reduction Act of 1980 (title 44, U.S. Code, Chapter 35), the Office of Personnel Management (OPM) is submitting to the Office of Management and Budget (OMB) a request for the continued use of the SF 15, Application for 10-Point Veteran Preference, which gathers information to support applicant claims for veterans' preference.

#### **A. Justification for Standard Form 15**

1. Veterans' preference is established by the Veterans Preference Act of 1944, as amended, and is now codified in various provisions of title 5, United States Code (U.S.C.). By law, veterans who are disabled or who served on active duty in the Armed Forces during certain specific time periods or in military campaigns are entitled to preference over others in hiring from competitive lists of eligibles. Specifically, 5 U.S.C. 2108 and 3309 identify those persons eligible for 10-point veterans' preference. Consequently, a veteran must be informed of his or her rights and provided with a procedure for securing these rights.

2. OPM and agency examining offices use the information from the SF 15, including supporting documentation, to determine if the applicant for a Federal job is eligible for the type of 10-point preference he or she is claiming. Without this information, officials would not know how to adjudicate the claim, because there are seven different types of claims and required documentation varies accordingly. The submission of documents alone without the SF 15 would not satisfy this need.

The SF 15 is used to permanently document the veteran's claim in the veteran's Official Personnel Folder upon appointment. This is especially important in Reduction in Force (RIF) actions where veterans' preference comes into play with regard to retention and in certain types of appointment actions, such as Veterans Recruitment Appointments.

3. An electronic version of the SF 15 is available on OPM's website in PDF fillable format. The supporting documentation that must be submitted with the SF 15 provides most of the information agencies use to adjudicate veterans' preference. The information may come from the military, the Department of Veterans Affairs (DVA), the courts, or hospitals, as appropriate. Most applicants applying for 10-point veterans' preference maintain electronic copies of these documents along with the SF 15 in their USAJOBS accounts and submit these documents electronically to hiring agencies when applying for Federal jobs.

4. Items 1 – 2 are also found on the *Declaration for Federal Employment form*, OF 306. This form is generally used later in the application process before an applicant is actually appointed. Items 1 – 2 must be repeated, because in many cases the applicant applies for a job by submitting only a resume. When this occurs and the individual indicates that he or she is eligible for 10-point veterans' preference, the applicant must provide the SF 15 and supporting documentation. An applicant may also submit a certificate (letter) from DVA determining eligibility for a 10-point preference. We must have a means of identifying the material submitted to the examining office holding the employment application. These items aid in this identification process. The duplicate information is for identification purposes only.

5. The collection of information does not impact small businesses or other small entities; the collection is from individuals only.
6. Veterans' preference is a factor considered in Federal hiring. Federal agencies will not be able to grant the veterans' preference benefit established by statute if the information is not collected. The collection usually occurs once; however, if applicants are applying for numerous positions, they usually submit photocopies of the SF 15 and documentation.
7. There are no special reporting or recordkeeping requirements that increase the burden on applicants.
8. In the 60-Day Notice, we proposed to submit to the Office of Management and Budget a request to reinstate an expired information collection instrument. The notice was reported on November 17, 2017, at 82 FR 55421.
9. No payment or gift is made to respondents.
10. The Privacy Act Statement printed on the form identifies limitations on disclosure. The Privacy System of Records covering this information is OPM Government 5: Recruiting, Examining, and Placement Records.
11. Questions 7, 8, and 9, concerning marital status, are of a personal nature. The law clearly provides that the marital status of spouses, widows, widowers, and parents of veterans is required in order to determine preference eligibility. Therefore, if application is made for spouse, widows, widowers, or parent's preference, the adjudicator must know the applicant's marital status.
12. Approximately 18,418 SF 15 forms will be processed each year from veterans, employees, annuitants, former spouses and individuals. The SF 15 requires approximately 20 minutes for the respondents to read the instructions and complete the form. A burden of 6,139 hours is estimated and is not expected to vary substantially.

Form Name	Form Number	No. of Respondents	No. of Responses per Respondent	Average Burden per Response (in hours)	Total Annual Burden (in hours)	Average Hourly Wage Rate	Total Annual Respondent Cost
Application for 10-Point Veteran Preference	SF 15	18,418	1	.3333	6,139	\$10.75	\$247,492

13. There is no cost to applicants (respondents or record keepers) for the collection of information or its recordkeeping.
14. The cost of processing applicant forms for requesting veterans' preference is not tracked or maintained separately from the cost to agencies for processing and maintaining applications for Federal employment. The approximate cost in processing these forms is calculated based upon

CPDF information as the best estimate of annual usage of the SF 15 by veterans to obtain employment. This cost is calculated by processing the total forms indicated by CPDF (18,418) at a rate of \$10.75 per form (15 minutes of the average hourly rate) for a total of \$197,994 plus 25% overhead (\$49,499) resulting in a total cost of \$247,493 to the government.

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15. The reporting burden is 6,139 hours. Since OPM began providing the SF 15 in an easily accessible online version, both fillable and printable, agencies have hired greater numbers of disabled veterans into the Federal Government. The increasing use of SF 15s, and the reporting burden each successive year, is attributable to additional hiring of disabled veterans.

16. Not applicable. Information is not published.

17. Request SF-15 extended with a three year renewal. OPM is responsible for substantive changes to the form driven by changes to veterans' preference law in title 5, United States Code.

18. Not applicable.

**B. Collection of Information Employing Statistical Method**

**Not applicable**