

SUPPORTING STATEMENT – PART A

Employment Applications (0702-0133)

1. Need for the Information Collection

This information collection request covers the documentation related to the employment of individuals to the Army and Air Force Exchange Service (Exchange) within the Continental United States of America (CONUS) and Exchange facilities outside the Continental United States (OCONUS). The collection allows the Exchange to capture the essential information required to evaluate applicants for Exchange civilian opportunities in order to hire the best, qualified individuals empowering the Exchange's mission of enhancing the quality of life for members of the United States Military.

The collection of personal information from individuals of the public for use in Exchange employment opportunities is authorized by Title 10 U.S.C. §7013, "Secretary of the Army," Title 10 U.S.C. §9013, "Secretary of the Air Force", Army Regulation 215-8/AFI 34-211(I), "Army and Air Force Exchange Service Operations," and Executive Order 9397 (SSN), as amended.

2. Use of the Information

The primary purpose of this information collection is to gather all the necessary data and qualifications from individuals at the time of his or her application for employment. This information is used by Exchange hiring managers in the decision of choosing the right individual for open job opportunities. Applications are submitted to the Exchange either by electronic means or manually through a Local National (LN) application. Information collected on applications varies based upon the nature of the position applied for or if the position is located in a foreign country.

Applications for job opportunities within the CONUS region are submitted to the Exchange through a third party web-based system provided through First Advantage®. This system is available through the Exchange website at <https://shopmyexchange.com> under "Exchange Careers" or by visiting <http://www.applymyexchange.com>. The system tracks, manages and interacts with the applicant who is seeking employment consideration. Individuals submit application materials, including contact information, social security number, cover letters, resumes, school transcripts, reference letters and a list of references. If the respondent chooses, they may download this material directly from their personal social medial account.

This web-based system provides instructions to the applicants when they press the "help" function on any screen. Individuals without access to a computer may apply by using a system at their local Exchange. Screen shots of what the individual views when providing information is submitted in ROCIS.

Individuals interested in applying for employment opportunities as an Exchange Driver are also required to complete Exchange Form 1200-026 "Driver's Supplemental Information". For verification and security purposes, all driver applicants must provide a copy of their driving record for the past (7) years which includes the following information: status of driver's license, traffic accidents, driving record points, traffic law violations, convictions and fines, Driving Under the Influence (DUI) public records, whether their driver's license is valid, denied, suspended, revoked or cancelled, and permits or privileges. Additionally, they must provide information on the last seven (7) years of past residential address and criminal background information

The Exchange has been exploring options of automating employment applications for Local Nationals (LN) in the OCONUS areas. However, with the cost of implementation and coupled with a host of overseas data protection regulations, this automation update may take many years to complete. Currently, the standard practice is to have applications for Exchange jobs as Local Nationals (LN) in the OCONUS areas be manually completed. Individuals who apply for LN positions must agree to be compliant with any local treaties or arrangements between the United States of America and the host country. Completed application forms are then forwarded to the correct Exchange management hiring authority for review. The following forms are used for collection purposes in the OCONUS region.

- **Germany;** Individuals complete the Exchange-Europe Form 1200-718 entitled "Local National Employment Application – German Only". This application is used for individuals wishing to work in areas within the United States European Command (EURCOM) such as Grafenwohr, Ramstein, Weisbaden, and the Germersheim Distribution Center. This form collects personal information including the individual's name, home address and phone number, citizenship, residence dates, education, conviction history and work history.
- **Turkey;** Individuals complete the Exchange OCONUS form entitled "Exchange Army and Air Force Exchange Service AAFES-Turkey Application for Employment". This form is also used as a means to hire LN's in the Turkey area for unique situations such as for the Tactical Field site in remote locations or to fulfill legal disability quota. This application form collects personal information which includes the individual's name, address, telephone number, date and place of birth, age, sex, color of eyes and hair, height and weight, marital status, mother and father's names, children's names, education institutions, foreign languages spoken, employment history, reference names and contact information, physical condition, police records, military status and names of relatives working at the same location for which the individual is applying for a position.
- **Italy;** Individuals complete the Exchange OCONUS form entitled "Employment Application for External Candidates". Individuals who are presented an application form will also be presented a memorandum with instructions on completing the form and a listing of additional documents to provide as part of their application. This form collects personal information including the individual's name, address, date and place of birth, e-

mail address, phone number, citizenship, ID or passport number, type of driver's license, reference names and contact information, names of relatives working for the United States government, education information, the individual's language proficiency, employment history, and military history. A copy of this declaration in Italian is attached with the application. Additional documents provided by the individual may include a copy of their Italian ID card, a passport picture, a copy of the "codice fiscale" or tax code, copy of educational diplomas or certificate of attendance, copies of any special licenses, and a copy of their military discharge papers if applicable.

Italian applicants who do not have passports must complete a "Declaration" stating they wish to be hired as a local citizen. This declaration is part of the application attached and is only available in Italian.

- **United Kingdom (UK);** Individuals complete the Exchange OCONUS form entitled "Initial Application for Local National Employment with the Army and Air Force Exchange Service (AAFES)". Individuals are presented application directions as the first page of the application. These directions lead individuals to the web-based application format except for positions as LNs. The LN application collects personal information which includes the individual's name, data of birth, home address, e-mail address, phone number, mobile number, citizenship, ability to obtain a driver's license, passport and visa information, names of other relative working for the Exchange, educational and work history, criminal records, medical information which may affect work restrictions, and personal references including names and contact information.

Applications for specific positions are reviewed by the hiring manager. Should the individual be hired, their application is placed within their Official Personnel File (OPF). Applications for individuals who are not offered a position are maintained for a period of six months and then removed from the electronic system. LN applications are destroyed by shredding.

Our recently published 60 Day Federal Register Notice included two additional collection instruments; Local National Applications for Employment for Host Countries in South Korea and Japan. These regions are covered separately under the Status of Forces Agreement (SOFA) with either South Korea/Guam or Japan/Okinawa. Individuals interested in job opportunities must complete either the United States Forces Korea (USFK) or the United States Forces Japan (USFJ) for the area of interest. Based on this, these applications are not part of this clearance process.

3. Use of Information Technology

Ninety-Eight Percent (98%) of applications received by the Exchange are submitted electronically. LN applications do not currently use an electronic hiring solution and therefore are manually completed and submitted to the local Human Resource authority. Electronic submissions are only used for CONUS job opportunities.

The web-based application allows individuals easy access to job opportunities with the Exchange. The system allows the individual to set up job alerts so they may be notified by e-mail of any new employment opportunities. Individuals can access the system on a 24-7 basis, 7 days a week. The system provides the individual with the status of the processing of their application, allows editing of information already provided, and provides all job related criteria. The individual may apply for more than one job at a time, keep their resume active for future opportunities, or may choose to delete everything, including their profile information. The individual's burden of time is dramatically reduced from the amount of time it would take to complete and submit a hard copy application form.

Utilization of this electronic system permits the Exchange to reach applicants that are more qualified, obtain faster background checks, and hire the best-qualified associate. Qualified hiring authorities have immediate access to application information for interview purposes. Information and data is readily available for disclosure to the individual or his/her designee upon request pursuant to the Privacy Act of 1974, as amended.

The Exchange is developing a new gateway within the electronic application system to allow applicants the ability to apply for opportunities for Exchange Permanent Change of Station (PCS) to foreign countries. A draft application is enclosed for OMB's review. The planning stage for such development should be completed in May 2019 with immediate introduction into the Exchange electronic application system. Exchange management does not believe this will increase the public burden but instead re-route respondents to better job opportunities fitting their desires.

4. Non-Duplication

The information obtained through this collection is unique and is not already available for use or adaptation from another cleared source.

5. Burden on Small Business

The information collection does not impose a significant economic impact on a substantial number of small businesses or entities.

6. Less Frequent Collection

Information is collected from members of the public at their request when applying for open job opportunities with the Exchange. Collection is "as needed" or "on occasion". Less frequent collection is not possible.

7. Paperwork Reduction Act Guidelines

This collection of information does not require collection to be conducted in a manner inconsistent with the guidelines delineated in 5 CFR 1320.5(d)(2).

8. Consultation and Public Comments

Part A: PUBLIC NOTICE

A 60-Day Federal Register Notice of the collection published on Thursday, January 31, 2019. The 60-Day FRN citation is 84 FRN 674.

No comments were received during the 60-Day Comment Period.

A 30-Day Federal Register Notice of the collection published on Wednesday, April 10, 2019. The 30-Day FRN citation is 84 FRN 14352.

Part B: CONSULTATION

Significant input and information was obtained from Exchange Human Resource Managers worldwide in relation to the continued use and burden relative to collection of information. It was determined that information is only maintained in one database and used accordingly as outlined in section 2 of this statement.

9. Gifts or Payment

No payments or gifts are being offered to respondents as an incentive to participate in the collection.

10. Confidentiality

The information collected and maintained in this system is protected under the Privacy Act of 1974, as amended. Respondents are assured confidentiality through the Privacy Act Statement(s) available for reading on the applicable collection documents. First Advantage® on-line application system requires respondent acknowledge receipt of the Agency Disclosure Notice and the Privacy Act Statement prior to proceeding with application process. These notices have been updated and presented in draft form on each of the attached collection instruments.

A draft copy of the modified SORN AAFES 0403.01, "Application for Employment Files" has been provided with this package for OMB's review.

Enclosed is a copy of the Exchange Privacy Impact Assessment (PIA) for the electronic collection and maintenance of information. The PIA may be viewed at <https://www.aafes.com/about-exchange/public-affairs/FOIA/assessments.htm>.

Non-selected applicant files (electronic and hard copies) are retained for a period of one year and then destroyed by shredding or deletion from the applicant database. Files for individuals hired become part of the individual's Official Personnel Folder. Upon

separation from employment, the file is transferred to the National Personnel Records Center (NPRC) in Valmeyer, IL and maintained for an additional 65 years.

11. Sensitive Questions

The Exchange is an Equal Employment Opportunity Employer and is committed to diversity in the workplace. We are required by federal law to gather basic demographic information to help measure the effectiveness of our recruitment efforts. Respondents may be asked to provide their Social Security Number, age, height, weight, gender, ethnicity and race, and possible physical behavioral attitudes or lifestyles, and medical history. Medical providers or law enforcement entities may use collected sensitive items in treatment or investigation into background history. The collection is authorized by DoD 5400.11-R, C4. Social Security Number collection is authorized as an acceptable use under DoDI 1000.30, Enclosure 2, sections 2.c.(2), (3), (5), and (9). Justification for use of the SSN is provided.

12. Respondent Burden and its Labor Cost

a. Estimation of Respondent Burden

1.1 Exchange Web-based CONUS Employment Applications

- a. Number of Respondents: 97,187
- b. Number Of Responses Per Respondent: 1
- c. Number of Total Annual Responses: 97,187
- d. Response Time: 30 Minutes (.5 hour)
- e. Respondent Burden Hours: 48,594 Hours

1.2 Form 1200-026 “Driver’s Supplemental Information”

- a. Number of Respondents: 774
- b. Number Of Responses Per Respondent: 1
- c. Number of Total Annual Responses: 774
- d. Response Time: 60 Minutes (1 hour)
- e. Respondent Burden Hours: 774 Hours

1.3 Form 1200-718 “Local National Employment Application – German Only”

- a. Number of Respondents: 718
- b. Number Of Responses Per Respondent: 1
- c. Number of Total Annual Responses: 718
- d. Response Time: 45 Minutes (.75 Hour)
- e. Respondent Burden Hours: 539 Hours

1.4 Local National Employment Application – Turkey

- a. Number of Respondents: 33
- b. Number Of Responses Per Respondent: 1
- c. Number of Total Annual Responses: 33

- d. Response Time: 45 Minutes (.75 Hour)
- e. Respondent Burden Hours: 25 Hours

1.5 Local National Employment Applications – Italy

- a. Number of Respondents: 156
- b. Number Of Responses Per Respondent: 1
- c. Number of Total Annual Responses: 156
- d. Response Time: 45 Minutes (.75 Hour)
- e. Respondent Burden Hours: 117 Hours

1.6 Local National Employment Applications – United Kingdom

- a. Number of Respondents: 132
- b. Number Of Responses Per Respondent: 1
- c. Number of Total Annual Responses: 132
- d. Response Time: 45 Minutes (.75 Hour)
- e. Respondent Burden Hours: 99 Hours

2. Total Submission Burden

- a. Total Number of Respondents: 99,000
- b. Total Number of Annual Responses: 99,000
- c. Total Respondent Burden Hours: 50535

The total respondent burden hours reported on the 60 Day Federal Register Notice was calculated based on an overall average response time of 45 minutes, resulting in a significantly higher amount of hours for the collection of information. After a second review of the individual collection forms, in coordination with the Exchange Human Resource team, the total respondent burden hours are 50,535 vice 74,250.

b. Labor Cost of Respondent Burden

1.1 Exchange Web-based CONUS Employment Applications

- a. Number of Total Annual Responses: 97,187
- b. Response Time: 30 Minutes (.5 Hour)
- c. Respondent Hourly Wage: \$7.25
- d. Labor Burden per Response: \$3.63
- e. Total Labor Burden: \$352,303

1.2 Form 1200-026 “Driver’s Supplemental Information”

- a. Number of Total Annual Responses: 774
- b. Response Time: 60 Minutes (1 Hour)
- c. Respondent Hourly Wage: \$7.25
- d. Labor Burden per Response: \$7.25
- e. Total Labor Burden: \$5,612

1.3 Form 1200-718 “Local National Employment Application – German Only”

- a. Number of Total Annual Responses: 718
- b. Response Time: 45 Minutes (.75 Hour)
- c. Respondent Hourly Wage: \$7.25
- d. Labor Burden per Response: \$5.44
- e. Total Labor Burden: \$3,904

1.4 Local National Employment Application – Turkey

- a. Number of Total Annual Responses: 33
- b. Response Time: 45 Minutes (.75 Hour)
- c. Respondent Hourly Wage: \$7.25
- d. Labor Burden per Response: \$5.44
- e. Total Labor Burden: \$179

1.5 Local National Employment Applications – Italy

- a. Number of Total Annual Responses: 156
- b. Response Time: 45 Minutes (.75 Hour)
- c. Respondent Hourly Wage: \$7.25
- d. Labor Burden per Response: \$5.44
- e. Total Labor Burden: \$848

1.6 Local National Employment Applications – United Kingdom

- a. Number of Total Annual Responses: 132
- b. Response Time: 45 Minutes (.75 Hour)
- c. Respondent Hourly Wage: \$7.25
- d. Labor Burden per Response: \$5.44
- e. Total Labor Burden: \$718

2. Overall Labor Burden

- a. Total Number of Annual Responses: 99,000
- b. Total Labor Burden: \$358,719

Total labor burden has significantly decreased since the previous approval due to improved record keeping. The majority of respondents currently completing this collection are entry-level applicants who are currently unemployed, are retired, military spouses, or applying for temporary positions. We based our hourly burden on the current federal minimum wage (2009) posted at the Department of Labor Wage Website. (<https://www.dol.gov/general/topic/wages/minimumwage>).

13. Respondent Costs Other Than Burden Hour Costs

There are no annualized costs to respondents other than the labor burden costs addressed in Section 12 of this document to complete this collection.

14. Cost to the Federal Government

a. Labor Cost to the Federal Government

1.1 Exchange Web-based CONUS Employment Applications

- a. Number of total Annual Responses: 97,187
- b. Processing Time per Response: 30 Minutes (.5 Hour)
- c. Hourly Wage of Worker(s) Processing Responses: \$24.00
- d. Cost to Process Each Response: \$12.00
- e. Total Cost to Process Responses: \$1,166,244

1.2 Form 1200-026 “Driver’s Supplemental Information”

- a. Number of total Annual Responses: 774
- b. Processing Time per Response: 30 Minutes (.5 Hour)
- c. Hourly Wage of Worker(s) Processing Responses: \$24.00
- d. Cost to Process Each Response: \$12.00
- e. Total Cost to Process Responses: \$9,288

1.3 Form 1200-718 “Local National Employment Application – German Only”

- a. Number of total Annual Responses: 718
- b. Processing Time per Response: 30 Minutes (.5 Hour)
- c. Hourly Wage of Worker(s) Processing Responses: \$24.00
- d. Cost to Process Each Response: \$12.00
- e. Total Cost to Process Responses: \$8,616

1.4 Local National Employment Application – Turkey

- a. Number of total Annual Responses: 33
- b. Processing Time per Response: 30 Minutes (.5 Hour)
- c. Hourly Wage of Worker(s) Processing Responses: \$24.00
- d. Cost to Process Each Response: \$12.00
- e. Total Cost to Process Responses: \$396

1.5 Local National Employment Application – Italy

- a. Number of total Annual Responses: 156
- b. Processing Time per Response: 30 Minutes (.5 Hour)
- c. Hourly Wage of Worker(s) Processing Responses: \$24.00
- d. Cost to Process Each Response: \$12.00
- e. Total Cost to Process Responses: \$1,872

1.6 Local National Employment Application – United Kingdom

- a. Number of total Annual Responses: 132
- b. Processing Time per Response: 30 Minutes (.5 Hour)
- c. Hourly Wage of Worker(s) Processing Responses: \$24.00
- d. Cost to Process Each Response: \$12.00
- e. Total Cost to Process Responses: \$1,584

2. Overall Labor Burden to Federal Government

- a. Number of total Annual Responses: 99,000

b. Processing Time per Response: \$1,188,000

Since our previous approval, the receipt of collections of information on employment applications has increased, resulting in a much higher labor cost to the Exchange.

The hourly wage of workers was determined by using the rounded mid-point wage of NF pay band level 3 associates as displayed in the August 3, 2018 152 DFW Pay Band Schedule 033-49 listed at <https://www.cpmosd.mil/Content/NAF%20Schedules/survey-sch/152/152-033-49-NF.html> for Dallas, Texas. (Maximum Hourly Rate – Minimum Hourly Rate) / 2 + (Minimum Hourly Rate)

b. Operational and Maintenance Cost

- a. Equipment: \$83,300
- b. Printing: \$6,500.00
- c. Postage: \$6,300.00
- d. Software Purchases: \$207,000 (Annual Cost for First Advantage®.)
- e. Licensing Costs: \$0.00
- f. Other: \$ 270,300 (Expenses include, Job fairs, communication costs, database storage/maintenance, and publishing costs)
- g. Total: \$573,400

- 1. Total Operational and Maintenance Costs: \$573,400
- 2. Total Labor cost to the Federal Government: \$1,188,000
- 3. Total Cost to the Federal Government: \$1,761,400

Exchange human resource recruiting actions has initiated more contact with captive audiences such as military spouses, veterans, and individuals with disabilities about job opportunities worldwide. Recruiting efforts have increased job applications and the cost to the Exchange to maintain such recruiting programs.

15. Reasons for Change in Burden

The burden has increased since the previous approval due to a higher collection of information received on employment applications as shown in item number 12 of this statement.

16. Publication of Results

The results of this information collection will not be published.

17. Non-Display of OMB Expiration Date:

We are not seeking approval to omit the display of the expiration date of this OMB approval on the collection instruments.

18. Exceptions to “Certification for Paperwork Reduction Submissions”

We are not requesting any exemptions to the provisions stated in 5 CFR 1320.9.