

**SUPPORTING STATEMENT FOR REQUESTS FOR APPROVAL UNDER
THE PAPERWORK REDUCTION ACT AND 5 CFR 1320
EMPLOYMENT APPLICATION, OMB CONTROL NUMBER 3316-0063**

A. Justification

- 1. Explain the circumstances that make the collection of information necessary. Identify any legal or administrative requirements that necessitate the collection. Attach a copy of the appropriate section of each statute and regulation mandating or authorizing the collection of information.**

This information collection request covers the documentation related to the employment application process for TVA. An applicant initially provides information to TVA electronically in the form of a resume and application form. Additional information may be requested from applicants who are selected as prospective candidates for positions with TVA.

Applicant resumes and application forms are accepted from the public who have interest in employment with TVA.

The applicant job application form and resume are needed to collect information on each applicant's qualifications and suitability for employment. TVA Forms 3595 and 17900 are used to collect information to determine an applicant's eligibility for veteran's preference. The information is used to make comparative appraisals and to assist in selections.

Section 3 of the TVA Act (included in this submission) authorizes the collection of the information.

- 2. Indicate how, by whom, and for what purpose the information is to be used. Except for a new collection, indicate the actual use the agency has made of the information received from the current collection.**

The information is used by TVA Talent Acquisition Consultants, HR Generalists, HR Support Services personnel, hiring managers, and security personnel to evaluate applicants' qualifications, to determine their eligibility for TVA positions, and to determine their suitability for employment.

- 3. Describe whether, and to what extent, the collection of information involves the use of automated, electronic, mechanical, or other technological collection techniques or other forms of information technology, e.g. permitting electronic submission of responses, and the basis for the decision for adopting this means of collection. Also, describe any consideration of using information technology to reduce burden.**

Technology within TVA allows applicants to apply for TVA's externally posted positions by submitting job application forms, resumes and veterans' preference forms electronically. The electronic information provided by the applicant is populated into an electronic database. This data maintenance/retrieval system allows for less paper handling, fewer hard file needs, more applicant filing space, and access at all times to all applicant information. These allowances are the basis for the decision to adopt these means of collection. Electronic collection reduces the candidate's burden because information is automatically collected from the applicant's resume and placed into the appropriate fields on the electronic application form.

An applicant must submit an electronic application form and a resume containing their job qualifications each time they apply for a TVA position. Information from the applicant's resume automatically populates the electronic application form, reducing the applicant's burden of having to enter the same information each time they submit an application.

- 4. Describe efforts to identify duplication. Show specifically why any similar information already available cannot be used or modified for use for the purposes described in Item 2 above.**

TVA currently electronically searches to match a unique applicant identifier against those already on file.

There are no other sources for information for individuals seeking employment with TVA.

- 5. If the collection of information impacts small business or other small entities (Item 5 of OMB Form 83-I), describe any methods used to minimize burden.**

Not Applicable.

6. **Describe the consequence to Federal program or policy activities if the collection is not conducted or is conducted less frequently, as well as any technical or legal obstacles to reducing burden.**

The online application captures the essential information required to evaluate applicants for specific TVA positions. The collection cannot be made less frequently as it is the source of the most current information about the applicants.

7. **Explain any special circumstances that would cause an information collection to be conducted in a manner:**

- requiring respondents to report information to the agency more often than quarterly;
- requiring respondents to prepare a written response to a collection of information in fewer than 30 days after receipt of it;
- requiring respondents to submit more than an original and two copies of any document;
- requiring respondents to retain records, other than health, medical, government contract, grant-in-aid, or tax records for more than three years;
- in connection with a statistical survey, that is not designed to produce valid and reliable results that can be generalized to the universe of study;
- requiring the use of statistical data classification that has not been reviewed and approved by OMB; that includes a pledge of confidentiality that is not supported by authority established in statute or regulation, that is not supported by disclosure and data security policies that are consistent with the pledge, or which unnecessarily impedes sharing of data with other agencies for compatible confidential use; or
- requiring respondents to submit proprietary trade secret, or other confidential information unless the agency can demonstrate that it has instituted procedures to protect the information's confidentiality to the extent permitted by law.

None.

8. **If applicable, provide a copy and identify the date and page number of publication in the Federal Register of the agency's notice, required by 5 CFR 1320.8(d), soliciting comments on the information collection prior to submission to OMB. Summarize public comments received in response to that notice and describe actions taken by the agency in response to these comments. Specifically address comments received on cost and hour burden.**

Describe efforts to consult with persons outside the agency to obtain their views on the availability of data, frequency of collection, the clarity of instructions and recordkeeping, disclosure, or reporting format (if any), and on the data elements to be recorded, disclosed, or reported.

Consultation with representatives of those from whom information is to be obtained or those who must compile records should occur at least once every 3 years—even if the collection of information activity is the same as in prior periods. There may be circumstances that may preclude consultation in a specific situation. These circumstances should be explained.

On August 21, 2019, and November 29, 2019, TVA published in the Federal Register a notice describing this information collection and seeking comments from the public. Copies of the Federal Register Notices are included as part of the OMB submission process. TVA did not receive any public comments in response to the Federal Register notices.

The pool of applicants for TVA employment is unique and the information is, therefore, not elsewhere available. Feedback about the electronic and paper forms is frequently received from the applicants themselves. The electronic job application form, Form TVA 3595 and Form 17900 are reviewed periodically and may be revised to simplify and enhance their utility based, in part, on feedback from applicants.

TVA receives this feedback by email, letter and telephone.

This statement, appearing on the external Careers home page, provides applicants with the information necessary to provide feedback by email, letter or telephone.

Contact Us

Email us at careers@tva.gov, or call (866) 620-8010 to leave a message. Phone calls are returned from 10 to 11 a.m. and 2 to 3 p.m. Monday through Friday, excluding federal holidays.

The TVA Privacy Program screen contains this statement inviting applicants to provide feedback by email or letter.

Contact Info

If you have privacy-related questions or complaints, please e-mail tvainfo@tva.com or write to:
Tennessee Valley Authority
400 W. Summit Hill Dr.
Knoxville, TN 37902-1499

On the external application screen, the following contact information is provided for feedback that is specifically about Veterans Preference.

More information about preference eligibility, and a link to TVA Form 3595, can be found at <https://www.tva.gov/Careers/Claiming-Veteran-Preference>. If you have a question about preference eligibility, please email your question to Veteran@tva.gov.

9. **Explain any decision to provide any payment or gift to respondents, other than remuneration of contractors or grantees.**

None.

10. **Describe any assurance of confidentiality provided to respondents and the basis for the assurance in statute, regulation, or agency policy.**

These records are maintained in a Privacy Act System of Records, TVA-13, Employment Applicant Files (copy included in this submission). A Privacy Act statement appears on all paper forms related to the employment application process.

Online information is transmitted using Hypertext Transfer Protocol Secure (HTTPS).

There is a link to the TVA Privacy Policy on the employment web sites. The Privacy Policy is at <https://www.tva.com/Information/TVA-Privacy-Policy>.

The Privacy Policy has a link to the TVA Privacy Act Systems of Records Notices that are published in the Federal Register. The Privacy Policy also provides information about the TVA Privacy Program including

responsibilities of the Senior Privacy Program Manager. There is also a link to more information about the TVA Privacy Program at http://www.tva.gov/abouttva/privacy_more.htm, including contact information for the Senior Privacy Program Manager.

In addition, there are Privacy Act Statements on the paper forms submitted as part of the application process. The paper forms also contain "Sensitive Information" markings which are required for this type of information by TVA-SPP-12.02, Information Management Policy. Sensitive Information is TVA's highest level of sensitivity. The Sensitive Information markings indicate that access to the information is restricted to those individuals who have this level of clearance. Sensitive Information clearances require an investigation above the standard employment background checks.

Internally, access to the information is restricted to those individuals who have a TVA network ID and password and management authorization to access the data. Some information is restricted to those individuals who hold the appropriate security clearance and have a business reason for needing to access the information.

11. **Provide additional justification for any questions of a sensitive nature, such as sexual behavior and attitudes, religious beliefs, and other matters that are commonly considered private. This justification should include the reasons why the agency considers the questions necessary, the specific uses to be made of the information, the explanation to be given to persons from whom the information is requested, and any steps to be taken to obtain their consent.**

The Demographic Information on Applicants form is designed to enable federal agencies to evaluate their employment practices by collecting and analyzing data on the race, national origin, sex and disability status of applicants for both permanent and temporary employment in order to comply with requirements of Equal Employment Opportunity Management Directive 715 (MD-715). MD-715 was promulgated under EEOC's authority under Title VII and the Rehabilitation Act. Federal agencies may or may not elect to use the form. Applicants for federal employment may or may not elect to complete the form. Therefore, federal agencies' and applicants use of the form is optional.

Currently the Office of Personnel Management (OPM) publishes forms SF-181, Ethnicity and Race Identification, and SF-256, Self-Identification of Disability, for use in obtaining data from federal employees. This collection would provide identical information from applicants allowing federal agencies to measure the effectiveness of their recruitment efforts.

EEOC is dedicated to ensuring that all segments of American society are represented within the federal workforce. Collection of this data allows federal agencies to develop outreach and recruiting programs to diversify the workforce. Diversification allows the federal workplace to capitalize on differing viewpoints, thereby improving the overall service provided to the public. The federal government's outreach efforts are important to meeting this goal and without the information received from this collection we will be unable to determine the effectiveness of a federal agency's recruitment program.

This type of sensitive information is covered at the Federal level by OMB Control #3046-0017, Uniform Guidelines on Employee Selection Procedure, and OMB Control #1250-0005, Office of Federal Control Compliance Programs Recordkeeping and Reporting Requirements under Rehabilitation Act of 1973, as Amended Section 503.

12. **Provide estimates of the hour burden of the collection of information. The statement should:**
 - **Indicate the number of respondents, frequency of response, annual hour burden, and an explanation of how the burden was estimated. Unless directed to do so, agencies should not conduct special surveys to obtain information on which to base hour burden estimates. Consultation with a sample (fewer than 10) of potential respondents is desirable. If the hour burden on respondents is expected to vary widely because of differences in activity, size, or complexity, show the range of estimated hour burden, and explain the reasons for the variance. Generally, estimates should not include burden hours for customary and usual business practices.**

- If this request for approval covers more than one form, provide separate hour burden estimates for each form and aggregate the hour burdens in Item 13 of OMB Form 83-I.

- Provide estimates of annualized cost to respondents for the hour burdens for collections of information, identifying and using appropriate wage rate categories. The cost of contracting out or paying outside parties for information collection activities should not be included here. Instead this cost should be included in Item 14.

		Resume & Application	Form 3595	Form 17900
a)	Number of respondents	2,046	499	15
b)	Frequency of response	1.1	1	1
c)	Number of responses	2,169	499	15
d)	Hours per response	1	.25	.25
e)	Annual burden hours	2,169	125	3.75
f)	Estimated annualized cost	\$52,490	\$3,025	\$91

Total estimated annualized cost to respondents: \$55,606.

Number of respondents - The estimates of annual applicant resumes and applications submissions are derived from FY2017-2019 data. Applicants are not limited on the number of positions on which they can apply.

Annualized cost per applicant: The average hourly wage for the states in the TVA service area is \$24.20, and was calculated using data from the 2018-19 Bureau of Labor Statistics National Compensation Survey on Wages from the following sources:

http://www.bls.gov/regions/southeast/news-release/countyemploymentandwages_mississippi.htm

http://www.bls.gov/regions/southeast/news-release/countyemploymentandwages_kentucky.htm

http://www.bls.gov/regions/southeast/news-release/countyemploymentandwages_alabama.htm

http://www.bls.gov/regions/southeast/news-release/countyemploymentandwages_tennessee.htm

http://www.bls.gov/regions/southeast/news-release/countyemploymentandwages_georgia.htm

http://www.bls.gov/regions/southeast/news-release/countyemploymentandwages_northcarolina.htm

http://www.bls.gov/regions/mid-atlantic/news-release/countyemploymentandwages_virginia.htm

13. Provide an estimate of the total annual cost burden to respondents or record keepers resulting from the collection of information. (Do not include the cost of any hour burden shown in Items 12 and 14).

The cost estimate should be split into two components: (a) a total capital and start-up cost component (annualized over its expected useful life); and (b) a total operation and maintenance and purchase of services component. The estimates should take into account costs associated with generating, maintaining, and disclosing or providing the information. Include descriptions of methods used to estimate major cost factors including system and technology acquisition, expected useful life of capital equipment, the discount rate(s), and the time period over which costs will be incurred. Capital and start-up costs include, among other items, preparations for collecting information such as purchasing computers and software; monitoring, sampling, drilling and testing equipment; and record storage facilities.

If cost estimates are expected to vary widely, agencies should present rates of cost burdens and explain the reasons for the variance. The cost of purchasing or contracting out information collection services should be a part of this cost burden estimate. In developing cost burden estimates, agencies may consult with a sample of respondents (fewer than 10), utilize the 60-day pre-OMB submission public comment process and use existing economic or regulatory impact analysis associated with the rulemaking containing the information collection, as appropriate.

Generally, estimates should not include purchases of equipment or services, or portions thereof, made: (1) prior to October 1, 1995, (2) to achieve regulatory compliance with requirements not associated with the information collection, (3) for reasons other than to provide information or keep records for the government, or (4) as part of customary and usual business or private practices.

Applicants are not required to retain any of their application records, but may be requested to provide evidence of their qualifications, e.g., professional certifications.

14. **Provide estimates of annualized cost to the Federal government. Also, provide a description of the method used to estimate cost, which should include quantification of hours, operational expenses (such as equipment, overhead, printing, and support staff), and any other expense that would not have been incurred without this collection of information. Agencies also may aggregate cost estimates from Items 12, 13, and 14 in a single table.**

The applicant profiles, resumes and application forms are collected electronically. Approximately .25 FTEs are required to process all other forms.

Additionally, other possible agency users such as Talent Acquisition Consultants, HR Generalists, HR Support Services personnel, security personnel, and hiring managers are estimated to handle the employment forms. The number of personnel who may handle respondent information and the time spent by each on respondent information are dependent upon company employment needs and resulting interviews, offers, and actual employment.

Estimated annualized costs:

processing:	.25 FTE x \$50,000 x 1.3 for benefits/other	=	\$16,250
handling:	.25 FTE x \$75,000 x 1.3	=	\$24,375
		estimated annual total =	\$40,625

15. **Explain the reasons for any program changes or adjustment reported in Items 13 or 14 of the OMB Form 83-I.**

The data provided in the last recertification included an enterprise-wide internal reorganization during which all TVA employees were required to re-apply for employment. In that period most employees applied on multiple positions, which dramatically increased the normal response figures and annual burden hours.

The period covered for the data in this recertification did not include an internal reorganization. In addition, the current period included a reduction in force. With the employees not re-applying for employment and fewer external job postings than in previous years, there was a dramatic decrease in annual responses and burden hours during this period as compared with the previous period.

16. **For collections of information whose results will be published, outline plans for tabulation, and publication. Address any complex analytical techniques that will be used. Provide the time schedule for the entire project, including beginning and ending dates of the collection of information, completion of report, publication dates, and other actions.**

Not applicable.

17. **If seeking approval to not display the expiration date for OMB approval of the information collection, explain the reasons that display would be inappropriate.**

Not applicable.

18. **Explain each exception to the certification statement identified in Item 19, "Certification for Paperwork Reduction Act Submissions," of OMB Form 83-I.**

Not applicable.

B. Collections of Information Employing Statistical Methods

This information collection does not employ statistical methods in the selection of people who respond or in the use of the information that is provided by the respondents.

The agency should be prepared to justify its decision not to use statistical methods in any case where such methods might reduce burden or improve accuracy of results. When Item 17 on the Form OMB 83-I is checked, "Yes," the following documentation should be included in the Supporting Statement to the extent that it applies to the methods proposed:

- 1. Describe (including a numerical estimate) the potential respondent universe and any sampling or other respondent selection methods to be used. Data on the number of entities (e.g., establishments, State and local government units, households, or persons) in the universe covered by the collection and in the corresponding sample are to be provided in tabular form for the universe as a whole and for each of the strata in the proposed sample. Indicate expected response rates for the collection as a whole. If the collection had been conducted previously, include the actual response rate achieved during the last collection.**
- 2. Describe the procedures for the collection of information including:**
 - * Statistical methodology for stratification and sample selection,**
 - * Estimation procedure,**
 - * Degree of accuracy needed for the purpose described in the justification,**
 - * Unusual problems requiring specialized sampling procedures, and**
 - * Any use of periodic (less frequent than annual) data collection cycles to reduce burden.**
- 3. Describe methods to maximize response rates and to deal with issues of non-response. The accuracy and reliability of information collected must be shown to be adequate for intended uses. For collections based on sampling, a special justification must be provided for any collection that will not yield "reliable" data that can be generalized to the universe studied.**
- 4. Describe any tests of procedures or methods to be undertaken. Testing is encouraged as an effective means of refining collections of information to minimize burden and improve utility. Tests must be approved if they call for answers to identical questions from 10 or more respondents. A proposed test or set of test may be submitted for approval separately or in combination with the main collection of information.**
- 5. Provide the name and telephone number of individuals consulted on statistical aspects of the design and the name of the agency unit, contractor(s), grantee(s), or other person(s) who will actually collect and/or analyze the information for the agency.**