

FINAL SUPPORTING STATEMENT
FOR
NRC FORM 212, "QUALIFICATIONS INVESTIGATION
PROFESSIONAL, TECHNICAL, AND
ADMINISTRATIVE POSITIONS" 3150-0033

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EXTENSION

Description of the Information Collection

The NRC Form 212 is sent to former employers, supervisors, and other references indicated on job applications as a part of the investigation for suitability of external candidates for appointment to professional, technical and administrative positions in the U.S. Nuclear Regulatory Commission (NRC). The information obtained on NRC Form 212 is reviewed and evaluated by personnel of the Office of the Chief Human Capital Officer (OCHCO) in determining the qualifications of applicants for employment.

The form provides questions that are designed to prompt the responder to engage in a meaningful discussion for all positions and reduces the number of references required to support a hiring decision.

A. JUSTIFICATION

1. Need for and Practical Utility of the Collection of Information

Information requested on NRC Form 212 is used to determine the qualifications and suitability of applicants for employment in professional, technical, and administrative positions with the NRC. The completed form may be used to examine, rate and/or assess the prospective employee's qualifications. The information regarding the qualifications of applicants for employment is reviewed by professional personnel in OCHCO, in conjunction with other information in the NRC files, to determine the qualifications of the applicant for appointment to the position under consideration.

2. Agency Use of Information

The NRC Form 212, "Qualifications Investigation, Professional, Technical, and Administrative Positions" is used for investigating the qualifications of external candidates for appointment to professional, technical, and administrative positions in the NRC.

3. Reduction of Burden Through Information Technology

There are no legal obstacles to reducing the burden associated with this information collection. The NRC encourages respondents to use information technology when it would be beneficial to them. The non-recurrence of each individual collection makes it difficult to reduce the burden using technology. However, the NRC encourages the respondents to use any innovative technology which would reduce burden. It is estimated that approximately (0%) of the potential responses are filed electronically.

4. Effort to Identify Duplication and Use Similar Information

No sources of similar information are available. There is no duplication of requirements.

5. Effort to Reduce Small Business Burden

Information may be requested from individuals associated with small businesses; however, the amount of information requested is kept to a minimum while still allowing a full investigation.

6. Consequences to Federal Program or Policy Activities if the Collection Is Not Conducted or Is Conducted Less Frequently

Without this information, the agency's ability to make sound decisions on employment eligibility is negatively impacted.

7. Circumstances Which Justify Variation from OMB Guidelines

This request does not vary from OMB guidelines.

8. Consultations Outside the NRC

Opportunity for public comment on the information collection requirements for this clearance package was published in the Federal Register on October 17, 2019 (84 FR 55593). In addition, the OPM Listserv email group comprised of government personnel was contacted as part of the public consultation process via email. No comments were received.

9. Payment or Gift to Respondents

Not Applicable.

10. Confidentiality of Information

Confidential and proprietary information is protected in accordance with NRC regulations in Title 10 of the *Code of Federal Regulations* (10CFR) 9.17(a) and 10 CFR 2.390(b).

To maintain the privacy of applicants, completed NRC Form 212s are maintained in locked filing cabinets and destroyed within the Office of the Chief Human Capital Officer.

NRC Form 212 does not collect any personal identifiable information.

11. Justification for Sensitive Questions

Not applicable.

12. Estimated Burden and Burden Hour Cost

Based on staff experience, it is estimated that it takes about 30 minutes to complete a form. The total estimated burden for the approximately 500 forms received annually is 250 hours (0.5 hours x 500 forms). The estimated annual cost is \$69,500 (250 hours x \$278/hour).

The \$278 hourly rate used in the burden estimates is based on the Nuclear Regulatory Commission's fee for hourly rates as noted in 10 CFR 170.20 "Average cost per professional staff-hour." For more information on the basis of this rate, see the Revision of Fee Schedules; Fee Recovery for Fiscal Year 2019 (84 FR 22331, May 17, 2019).

13. Estimate of Other Additional Costs

There are no additional costs.

14. Estimated Annualized Cost to the Federal Government

The total estimated annual cost to the Federal Government for printing, handling, reviewing, and assessing the NRC Form 212 is \$69,500 (250 hours (500 x .5/hours) x 278/hour).

15. Reasons for Changes in Burden or Cost

The estimated burden has decreased from 500 hours annually to 250 hours annually, a decrease of 250 hours. The number of forms that NRC staff anticipates receiving has decreased from 1,000 forms annually to 500 forms annually. This decrease is due to a decline in external hiring since the last renewal of this information collection. The NRC staff estimates that the fiscal environment of reduced external hiring will continue during the upcoming clearance period. The NRC Form 212 is only used as part of the [suitability investigation](#) of external candidates as part of the hiring process. A reduction in external hires results in a reduction in the number of NRC Form 212s that are completed.

In addition, the fee rate has increased from \$268 per hour to \$278 per hour.

16. Publication for Statistical Use

This information is not published for statistical use.

17. Reason for Not Displaying the Expiration Date

The expiration date is displayed on the form.

18. Exceptions to the Certification Statement

Not applicable.

B. COLLECTION OF INFORMATION EMPLOYING STATISTICAL METHODS

Statistical methods are not used in this collection of information.