

SUPPORTING STATEMENT - PART A

DOD Telework Agreement – 0704-XXXX

1. Need for the Information Collection

Information is collected to register individuals as participants in the DoD alternative workplace program; to manage and document the duties of participants; and to fund, evaluate and report on program activity.

Authority: 10 U.S.C. 113, Secretary of Defense; DoD Instruction 1035.01, Telework Policy

2. Use of the Information

All employees who are authorized to telework shall complete a DD Form 2946. The DD Form 2946 shall be signed and dated by the employee and supervisor and maintained by the employee's supervisor. Components are encouraged to include a DD Form 2946 in the new employee on-boarding packages for those employees occupying telework eligible positions to ensure that they are aware of their telework responsibilities, should telework be offered or requested. Information on telework responsibilities should be posted throughout the workplace and included in periodic training events.

Telework agreements shall be reviewed by the supervisor and teleworker, re-validated at least every 2 years, and revised when appropriate. A new DD Form 2946 should be completed when a new supervisor is responsible for the employee. Telework agreements are to be maintained in the supervisor's employee work folder.

3. Use of Information Technology

100% of responses will be collected electronically. As responses are collected to enter a Telework Agreement, the intent is to request this information electronically so the responses are collected electronically. Instances where someone needs to complete the form without access to an electronic copy will be permitted but the normal practice of collecting electronically will be the standard procedure. Steps to increase use of information technology will include making the form available electronically only so respondents are accessing the form electronically, requiring the form to be submitted electronically and limiting the availability for print options.

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 Businesses

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

6. Less Frequent Collection

Recordkeeping and reporting needs to be done annually. This is the most infrequent collection interval possible because this agreement would not change unless circumstances

such as a new supervisor, position, or work factors affect the agreement. Collection of this form could be done less frequently than what was listed on the 60-Day FRN but in order to maintain updated information on respondents, an annual recordkeeping would help retain other data requests.

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 (FRN) for the collection published on Thursday, 18 March, 2021. The 60-Day FRN citation is vol. 86 no. 51 page 14740 FRN pages 14741.

One comment was received during the 60-Day Comment Period. It is included below in the order it was received, as well as our Agency's response to the comment.

As written, the form asks for redundant information. Block 2 requests "official job title," but with strict interpretation of this it is seemingly redundant to what is asked for in block 3, with (job) series. If using strict interpretation that official job title is derived solely from the job series, and not your actual position, it is a redundant field that can only lead to confusion.

My form was rejected when I responded with a job title that matches my business cards and official Organizational Chart, using "Assistant Product Manager." I was told this needs to be "Program Manager." In a PM world, Program Manager, Project Manager, Product Manager, and Assistant Product Manager all have distinct meanings though they would all be in the 0340 job series. Calling yourself a Program Manager when you are just a Project Manager, is false advertising. It is a waste of everyone's time to need to go back and re-do the form because someone is looking for the translation of the job series as the job title. Block 2 should be removed as it add no value, and in certain cases can lead to additional wasted time so someone can go back, change the form, get new signatures, and resubmit to make these match.

Additionally, every field needs to have instructions on where to get the requested information. Again, looking at block 2, especially if the form wants information that may not have regular use, there needs to be a resource to look the information up. Again, I am an Assistant Product Manager, the Program Manager is three levels above me. If the form wants me to put "Program Manager" down, I need to know where that direction is coming from. But again, I think block 2 should just be removed.

AGENCY RESPONSE

Thank you for your feedback. The distinction of block two is that it identifies a title such as “Program Manager” whereas block 3 is a series of letters and numbers that identify a position, e.g. GS-0340-13. Block two allows the employee to identify parenthetical titles such as Human Resources Specialist (Employee Relations) or (Employee Benefits), identify work leads and supervisors, or utilize Organizational Titles that complement the official position title.

A 30-Day Federal Register Notice for the collection published on Friday, May 28, 2021. The 30-Day FRN citation is 86 FR 28811 FRN 28811-28812.

Part B: CONSULTATION

No additional consultation apart from soliciting public comments through the Federal Register was conducted for this submission.

9. Gifts or Payment

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

10. Confidentiality

A Privacy Act Statement is not required for this collection because we are not requesting individuals to furnish personal information for a system of records.

A System of Record Notice (SORN) is not required for this collection because records are not retrievable by PII.

A Privacy Impact Assessment (PIA) is not required for this collection because PII is not being collected electronically.

This collection is a transitory record; it is destroyed when no longer needed for business use. When the form is updated, typically every two years it replaces the previous one.

11. Sensitive Questions

No questions are considered sensitive are being asked in this collection.

12. Respondent Burden and its Labor Costs

Part A: ESTIMATION OF RESPONDENT BURDEN

- 1) DD2946 - Telework Agreement Form
 - a) Number of Respondents: 560,000
 - b) Number of Responses Per Respondent: 1
 - c) Number of Total Annual Responses: 560,000
 - d) Response Time: 0.33 decimal hours
 - e) Respondent Burden Hours: 186666.7 hours

- 2) Total Submission Burden
 - a) Total Number of Respondents: 560,000
 - b) Total Number of Annual Responses: 560,000
 - c) Total Respondent Burden Hours: 186666.7 hours

Part B: LABOR COST OF RESPONDENT BURDEN

- 1) DD2946 - Telework Agreement Form
 - a) Number of Total Annual Responses: 560,000
 - b) Response Time: 0.33 decimal hours
 - c) Respondent Hourly Wage: \$41.92
 - d) Labor Burden per Response: \$13.83
 - e) Total Labor Burden: \$7,746,816

- 2) Overall Labor Burden
 - a) Total Number of Annual Responses: 1,120,000
 - b) Total Labor Burden: \$7,746,816

The Respondent hourly wage was determined by using the [Department of Labor Wage Website] (<http://www.dol.gov/dol/topic/wages/index.htm>)

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

Part A: LABOR COST TO THE FEDERAL GOVERNMENT

- 1) DD2946 - Telework Agreement Form
 - a) Number of Total Annual Responses: 560,000
 - b) Processing Time per Response: 0.33 hours
 - c) Hourly Wage of Worker(s) Processing Responses : \$41.92
 - d) Cost to Process Each Response (*P: B multiplied by C*): \$13.83
 - e) Total Cost to Process Responses (*P: A multiplied by D*): \$7,744,800

- 2) Overall Labor Burden to the Federal Government
 - a) Total Number of Annual Responses: \$560,000
 - b) Total Labor Burden: \$7,744,800

Part B: OPERATIONAL AND MAINTENANCE COSTS

- 1) Cost Categories
 - a) Equipment: \$0
 - b) Printing: \$0
 - c) Postage: \$0
 - d) Software Purchases: \$0
 - e) Licensing Costs: \$0

- f) Other: \$0
- 2) Total Operational and Maintenance Cost: \$0

Part C: TOTAL COST TO THE FEDERAL GOVERNMENT

- 1) Total Labor Cost to the Federal Government: \$7,744,800
- 2) Total Operational and Maintenance Costs: \$0
- 3) Total Cost to the Federal Government: \$7,744,800

15. Reasons for Change in Burden

This is an existing collection currently in use without an OMB Control Number.

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 the OMB approval on the collection instrument.

18. Exceptions to "Certification for Paperwork Reduction Submissions"

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