

# 1SUPPORTING STATEMENT A FOR PAPERWORK REDUCTION ACT SUBMISSION

## DOI Talent Registration OMB Control Number 1093-NEW

**Terms of Clearance:** None.

**General Instructions:** A completed Supporting Statement A must accompany each request for approval of a collection of information. The Supporting Statement must be prepared in the format described below, and must contain the information specified below. If an item is not applicable, provide a brief explanation. When the question "Does this ICR contain surveys, censuses, or employ statistical methods?" is checked "Yes," then a Supporting Statement B must be completed. OMB reserves the right to require the submission of additional information with respect to any request for approval.

### Specific Instructions

#### Justification

**1. Explain the circumstances that make the collection of information necessary. Identify any legal or administrative requirements that necessitate the collection.**

Department of the Interior (DOI) bureaus and offices host a wide variety of training courses that are pertinent to maintaining partnerships and advising state governments, universities, private business and private citizens about impacts of laws, policies and mission areas that are managed by the Department of the Interior. The courses require registration and attendance tracking. Registration and attendance records are maintained in the DOI Talent learning management system.

Registration and attendance are tracked for a variety of reasons, including creating a roster of attendees for logistical arrangements (classroom size, blocking of lodging rooms, required special accommodations, head count for meals, physical access to buildings, etc) as well as the need to produce a learning transcript history for the attendee. This is an information collection that is in use without OMB approval.

**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. Be specific. If this collection is a form or a questionnaire, every question needs to be justified.**

Registration and attendance are tracked for a variety of reasons, including creating a roster of attendees for logistical arrangements (classroom size, blocking of lodging rooms, required special accommodations, head count for meals, physical access to buildings, etc) as well as the need to produce a documented learning transcript history for the attendees. The information is used by course administrators, hotel workers, security personnel and DOI stakeholders.

The following data fields are collected for non-DOI individuals who are requesting a DOI Talent account and approval to attend the training sessions:

**Username:** Required to login to DOI Talent, email is used.  
**First Name:** To identify the individual  
**Last Name:** To identify the individual  
**Email:** Required to contact the individual and is used as the username  
**Organization Name:** To categorize the learner who is attending the course  
**Role:** From a drop down of choices, the user identifies themselves in terms of 'contractor', 'federal employee' or 'other'  
**Domain ID:** Identity of the bureau sponsoring the training  
**Sponsoring Bureau:** Identity of the bureau sponsoring the training  
**Address City:** In the event of duplicate names this is used to confirm if the user already has an account in the system.  
**Address State:** In the event of duplicate names this is used to confirm if the user already has an account in the system.  
**Address Zip:** In the event of duplicate names this is used to confirm if the user already has an account in the system.  
**Affiliation:** To provide a means to further identify the user as Volunteer, Student  
**Affiliate/Org Sponsor:** The user provides the name of the agency or business that they belong to.  
**Comments:** we ask that the user provide the COURSE NAME and whether the user has attended training with us before or have been affiliated with DOI in the past.

**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 and specifically how this collection meets GPEA requirements.**

DOI Talent account requests are collected via electronic means into the enterprise-wide learning management system because it provides a plug-in that supports this type of activity. The submitted account request is listed in an 'approval queue' directly in the learning management system and the user receives an email from the system notifying them of the status of their request as it is acted upon.

**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.**

DOI has no means to identify external learners who wish to attend training until they request an account. Efforts to avoid duplication of a user's information within the system are made each time a user requests an account. The information is manually reviewed and approved each time a user submits a request. Because users accounts are activated based on their desire to attend specific courses, their accounts are suspended once they have attended the course and reactivated when they request to attend a subsequent course.

**5. If the collection of information impacts small businesses or other small entities, describe any methods used to minimize burden.**

Occasionally we receive requests from learners who work for small businesses to attend courses. No specific steps are taken to minimize burden for small businesses; we attempt to

minimize burden to all learners who request an account.

**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.**

If we do not collect this information, the user will not be approved to attend the course, therefore decreasing the awareness of impacts of the law or technique that is being taught in the course.

**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 a 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 secrets, 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.

No special circumstances exist.

**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 in response to the PRA statement associated with the collection over the past three years, and describe actions taken by the agency in response to these comments. Specifically address comments received on cost and hour burden.**

On December 27, 2018, we published in the *Federal Register* (83 FR 66742) a notice of our intent to request that OMB approve this information collection. In that notice, we solicited comments for 60 days, ending on February 27, 2019. We did not receive any comments in response to that Notice.

**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 three 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.**

In addition to the Federal Register Notice, we consulted with the nine (9) individuals identified in Table 8.1 who familiar with this collection of information in order to validate our time burden estimate and asked for comments on the questions below:

**Table 8.1**

<b>Organization</b>	<b>Title</b>
@gmail.com;	unknown
@gmail.com;	unknown
@mnsu.edu;	unknown
Not-for-profit	unknown
CHOWAN UNIVERSITY	student
CORNELL UNIVERSITY	unknown
Colorado State University	Wildlife Support
Maryland Department of Natural Resources	Non-Construction Program
CONSERVATION CORPS MINNESOTA & IOWA	Heavy Equipment Operator

***“Whether or not the collection of information is necessary, including whether or not the information will have practical utility; whether there are any questions they felt were unnecessary”***

An email was sent to 9 personnel who recently requested and received DOI Talent accounts. The email requested their feedback and input on the burden of the time required to complete the application steps and read through the instructions. We also solicited any additional feedback regarding the process and recommendations for improvements.

Follow up emails were sent on two additional dates with one response received from a DOI Talent user. We do not collect phone numbers with the data that we request so we had no other way to contact these individuals.

**Comment 1:** The respondent had no comments with exception of concurring that the time-burden was five minutes to complete the form.

**Agency Response to Comment 1:** No adjustment was required

Comments: Respondent replied that they concurred that the collection was necessary.

Agency Response/Action Taken: No action necessary.

***“The accuracy of our estimate of the burden for this collection of information”***

Comments: Respondent replied that they concurred with the estimated time burden of 5 minutes

Agency Response/Action Taken: No action necessary.

***“Ways to enhance the quality, utility, and clarity of the information to be collected”***

Comments: Respondent provided no comments to this question

Agency Response/Action Taken: No action necessary.

And

***“Ways to minimize the burden of the collection of information on respondents”***

Comments: Respondent provided no comments to this question

Agency Response/Action Taken: No action necessary.

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

There is no gift or payment provided to respondents.

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

We do not provide any assurance of confidentiality. Information may be shared in accordance with the Privacy Act of 1974; in accordance with the routine uses listed in the following System of Record Notices:

- DOI-16, Learning Management System - [83 FR 50682](#) (October 9, 2018),
- OPM/GOVT-1, General Personnel Records, [77 FR 73694](#) (December 11, 2012); modification published [80 FR 74815](#) (November 30, 2015), and
- OPM/GOVT-2, Employee Performance File System Records, [71 FR 35347](#) (June 19, 2006); modification published [80 FR 74815](#) (November 30, 2015).

We provided OMB with copies of the referenced SORNs as supplemental documents to the ICR in ROCIS.

Below is the “Notice of Monitoring and Privacy Act Statement” provided to the requestor prior to entering their information into the online form to request an account. Users must confirm/acknowledge receipt by of the information by checking a box before progressing to the form fields.

“This is a United States Government computer system, maintained by the Department of the Interior, to provide Official Unclassified U.S. Government Information only. Use of this system by any authorized or unauthorized user constitutes consent to monitoring, retrieval, and disclosure by authorized personnel. USERS HAVE NO REASONABLE EXPECTATION OF PRIVACY IN THE USE OF THIS SYSTEM. Unauthorized use may subject violators to criminal, civil, and/or disciplinary action.

This is a Privacy Act system protected under the Privacy Act of 1974, as amended, 5 U.S.C. 552a. Information is requested under 5 U.S.C. 4101, 1104, 4118, 4308, 4506, 5405; 42 U.S.C. 2000d; 42 U.S.C. 112101; 44 U.S.C. 3501, et seq.; 5 CFR 410, Subpart C; Executive Order 11348; and Executive Order 12107. The purpose of collecting this information is to manage training and performance records and meet Federal recordkeeping and reporting requirements. Information will be used to create, validate, and manage agency training records and employee performance appraisals. This information may be shared with Department of the Interior and Office of Personnel Management officials to facilitate compliance with Federal and agency training and performance management requirements, and with other Federal agency officials or organizations for training and reporting purposes, to provide statistical information, provide transcript information upon student's request, or for other purposes as permitted under the routine uses outlined in the OPM/GOVT-1, General Personnel Records, 77 FR 73694, December 11, 2012; modification published 80 FR 74815, November 30, 2015; OPM/GOVT-2, Employee Performance File System of Records, June 19, 2006, 71 FR 35347; modification published 80 FR 74815, November 30, 2015; and DOI-16: DOI Learn (Department-wide Learning Management System), 70 FR 58230, October 5, 2005; modification published 73 FR 8342, February 13, 2008 for DOI training records, and modified again 83 FR 195, October 9, 2018. DOI and government-wide system of records notices may be viewed at <https://www.doi.gov/privacy/sorn>. This system is maintained by the Department of the Interior, Interior Business Center, a designated Human Resources Federal Shared Service Center providing cross agency support services to other Federal agencies. Individuals seeking information on records owned and maintained by a Federal agency should contact the employing agency in accordance with the applicable agency system of records notices. Providing information is voluntary; however, not providing the requested information may delay course registration, training completion, or other training and employee performance related actions.”

**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.**

We ask the learner if there are any necessary Special Accommodations that they require while attending the course. This could range from a special diet to requesting a sign-language interpreter. While this information is also solicited by the training

instructor once the learner is approved, we request it initially to allow the learner to consider the idea of any necessary accommodations they might need. It is not a required field.

**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.
- \* 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.

We estimate that we will receive 3800 responses totaling 317 burden hours. We estimate the annual dollar value of the burden hours is \$14,423.00 (rounded).

We used the of Bureau of Labor Statistics (BLS) News Release [USDL-21-0437](#), March 18, 2021, Employer Costs for Employee Compensation—December 2020” should be used for all labor and benefit calculations for calendar year 2021.

- Individuals. Table 1 lists the hourly rate for all workers \$38.60, including benefits.
- Private Sector. Table 5 lists the hourly rate for all workers as \$36.23, including benefits.
- Government. Table 3 lists the hourly rate for all workers as \$53.47, including benefits.

Requirement	Average Number of Annual Respondents	Average Number of Responses Each	Average Number of Annual Responses	Average Completion Time per Response	Estimated Annual Burden Hours	Hourly Rate	\$ Value of Annual Burden Hours
<b>IC-1</b>							
Individuals	300	1	1	5 min	25	\$ 38.60	965.00
Private Sector	1500	1	1	5 min	125	36.23	4528.75
Government	2000	1	1	5 min	167	53.47	8929.49
<b>Totals:</b>	<b>3800</b>				<b>317</b>		<b>14,423.24</b>

**13. Provide an estimate of the total annual non-hour cost burden to respondents or recordkeepers resulting from the collection of information. (Do not include the cost of any hour burden already reflected in item 12.)**

- \* 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 (including filing fees paid for form

processing). 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 ranges 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.

There is no non-hour cost burden associated with this collection.

**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.**

The hourly cost to the Federal Government is shown in Table 14-1 and based on data at: <https://www.opm.gov/policy-data-oversight/pay-leave/salaries-wages/salary-tables/pdf/2021/DCB.pdf>. The benefits multiplier of 1.6 is implied by information at: <http://www.bls.gov/news.release/ecec.nr0.htm>.

Total burden for maintaining external records in the DOI Talent system through the lifecycle of the account are estimated below.

Action	Position and Grade	Burden Per Acct, Annually	Hourly Rate	Fully Burdened Hourly Rate (Incl. Benefits)	Number of external records	Total Annual Hours	Total Annual Cost
Review of request for complete information	Data Steward - GS 11/05	3 min	39.51	63.22	3800	190	12,011.80
Research existing accounts to avoid duplication	Data Steward - GS 11/05	1 min	39.51	63.22	3800	63.3	4,001.83
Approve and create account:	Data Steward - GS 11/05	4 min	39.51	63.22	3800	253.3	16,013.63
Add account to requested course	Data Steward - GS 11/05	2 min	39.51	63.22	3800	126.6	8,003.65
Oversee accounts for relevancy:	Data Steward - GS 11/05	5 min	39.51	63.22	3800	316.6	20,015.45
Deactivate accounts when no longer needed:	Data Steward - GS 11/05	5 min	39.51	63.22	3800	316.6	20,015.45
<b>Total</b>		20 min per account					<b>80,061.81</b>



**15. Explain the reasons for any program changes or adjustments in hour or cost burden.**

This is a new information collection in use without OMB approval.

**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.**

The results of this collection are not published.

**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.**

N/A

**18. Explain each exception to the topics of the certification statement identified in "Certification for Paperwork Reduction Act Submissions."**

There are no exceptions to the certification statement in this collection.