<u>SUPPORTING STATEMENT - PART A</u>

Department of Defense Education Activity Employment Opportunities for Educators

OMB Control Number 0704-0370

Summary of Changes:

Please add changes to collection from previous version as needed

- DoDEA Form 5010, Application for Overseas Employment: Corrected/Changed the return address under the advisory notice section (top of page 1), added "E.O. 9397 SSN, as amended" and changed the disclosure verbiage under the Privacy Act Statement, added CUI control markings and/or instructions (top and bottom pages 1 and 2).
- DoDEA Form 5011, Professional Evaluation: Added "E.O. 9397 SSN, as amended" and changed the disclosure verbiage under the Privacy Act Statement, corrected/changed the return address under section 14 (page 2), added CUI control markings and/or instructions (top and bottom pages 1 and 2).
- DoDEA Form 5012, Department of Defense Dependents Schools (DoDDS)
 Voluntary Questionnaire has been cancelled resulting in a reduction of overall burden.
- DoDEA Form 5013: Added "E.O. 9397 SSN, as amended" and changed the disclosure verbiage under the Privacy Act Statement, added CUI control markings and/or instructions.

1. Need for the Information Collection

The Department of Defense Education Activity (DoDEA) is a Department of Defense (DoD) field activity operating under the direction, authority, and control of the Office of the Under Secretary of Defense for Personnel and Readiness (OUSD(P&R)). DoDEA operates 160 schools in 8 districts located in 11 countries, seven states, Guam, and Puerto Rico.

Under Title 20 U.S.C. Sections 902, 903, and 921-932, and Title 10 U.S.C. Section 2164(e), DoDEA requires the information to recruit qualified educators for employment overseas and stateside.

There are three (3) forms associated with this collection; DoDEA Form 5010, "Application for Overseas Employment," DoDEA Form 5011, "Professional Evaluation," and DoDEA Form 5013, "Verification of Professional Educator Employment for Salary Rating Purposes."

In the early days of 2011, DoDEA had embarked on a journey to streamline its hiring processes, which led to the discontinuation of certain HR forms that collected crucial hiring information. A decade later it became evident that the revival of these forms was not just necessary, but imperative. These forms were resurrected to provide multiple pathways for candidates to share their qualifications, enabling everyone to participate on an equal

footing. The forms now encompassed various formats: online applications and paper applications for those more comfortable with tangible documents. The reinstatement was also driven by policy evolution and the recent updates to DoDEA HR policies.

2. Use of the Information

DoDEA actively recruits and accepts applications in the Employment Application System (EAS) for teaching positions on a year-round basis. There are approximately 5,900 active applications in the EAS database, but this number fluctuates throughout the year especially during the peak hiring season (February-August). DoDEA attends a myriad of job fairs throughout the year for recruiting efforts and publishes positions identified as hard-to-fill on external sites (e.g. Top School Jobs, Handshake, UNI Overseas Teaching Services, etc.) as well as USAJobs for highest visibility, but all candidates interested in teaching with DoDEA must have an active application in the Employee Application System (EAS)database. When a teacher vacancy is reported to the Civilian Human Resources Agency (CHRA) DODEA Recruitment Division, their office generates a referral list from EAS of qualified candidates for the specific target job and geographic area of consideration.

DoDEA Forms 5010, 5011, and 5013 are employed to collect personally identifiable information about the applicant, including the applicant's social security number (SSN), in order to screen the applicant's educational qualifications and employment eligibility. Screening is accomplished by comparing application data collected on these three forms to other data, such as the applicant's educational transcripts, law enforcement records, and current teacher licensure records.

DoDEA Form 5010 collects the bulk of an applicant's application data, including data about academic qualification, prior work history, certification(s), and personal contact data. Less than 10 applicants complete the hard copy 5010 per year. The balance of the 6,000 applicants provides the same application information by imputing the data directly into the secure online electronic Employment Application System (EAS).

DoDEA Form 5011 collects prior employer evaluation data concerning the applicant (employment references). DoDEA Form 5011 is provided to current and prior supervisors to obtain pertinent evaluation information about the applicant. DoDEA employs this information to assist in making a hiring decision.

DoDEA Form 5013, with applicant's consent, obtains information from a maximum of five former employers to verify the applicant's prior non-DoDEA employment history and salary (for up to ten years) that is used to determine previous experience that is creditable for pay setting purposes.

DoDEA has implemented a mandatory online application system called the Employee Application System (EAS) https://webapps.dodea.edu/eas/. EAS is used to recruit overseas eligible candidates, such as military spouses, as well as candidates in the United States. Applicants can submit and manage their applications, accessing only their applications in the system. For individuals who have disabilities that cannot complete an

online application, EAS contains downloadable forms to assist the applicant in filing a hard copy application.

EAS combines all elements of DoDEA Form 5010, DoDEA Form 5011, and DoDEA Form 5013 into one web-based system allowing applicants to submit, modify, update, and track their online applications. Human Resource Specialists can evaluate applications, to help ensure the best candidates are chosen in order to create a world class education system for our students. Applicants who are unable to submit an online application must complete the DoDEA Form 5010, which will be input by the Human Resources Office.

Respondents are advised that their information is considered Controlled Unclassified Information (CUI) and will be maintained and used in strict confidence in accordance with Federal law and regulations and the procedures are in place to protect the confidentiality of the information. The paper forms are maintained in a controlled area to protect PII in accordance with DoD regulations governing the security of Department of Defense (DoD) databases and in conformity with the Privacy Act of 1974, 5 U.S.C. 552a, as Amended.

Records are maintained in a secure, limited access, or monitored area, and in computers secured in accordance with DoD security assurance and cyber requirements. Physical entry by authorized persons is restricted through the use of DoD authorized locks, and passwords or similar systems.

Computer terminal access is controlled by use of Common Access Card (CAC) or terminal identification and the password or similar system. Access to the information is limited to those DoDEA employees with an official need-to-know or who require the records to perform their official assigned duties, and by applicants to their own data.

3. <u>Use of Information Technology</u>

99.9% of applicants apply online through EAS. EAS site uses Secure Sockets Layer technology to help protect the privacy of online transactions whether the site is accessed from home or work. DoDEA HR Specialists, who evaluate applications, receive yearly Privacy Act and Personally Identifiable Information (PII) training, and have a secured password for entry into EAS. HR Specialists use the SSN and name to retrieve an application for evaluation. DoDEA personnel specialists use the SSN to securely link data collected on DoDEA Forms 5010, 5011, and 5013 with data in the EAS; and the SSN verifies the identity of a person whose name may not be unique.

Other educational, employment, and Federal web sites (such as USAJobs via the Office of Personnel Management (OPM)) have established links on their sites to EAS, opening the application pool to a diverse population. One hundred (100) percent of our placements come from applicants who have applied in EAS or had their data inputted in EAS by a DoDEA Human Resources Specialist (less than 10 per year).

4. <u>Non-duplication</u>

The DoDEA teaching workforce does not mirror other Federal workforces. DoDEA's teaching workforce consists exclusively of childhood education teachers, differing even from other Federal teaching positions that target only adult educators. Thus, DoDEA is the only Federal agency that employs Forms 5010, 5011, and 5013 for its educator recruitment and hiring process. DoDEA requires three separate forms because each collects information from different sources, and the sources do not require access to all applicant information that would have to be contained on a single form. Unlike other standard Federal employment application forms, two of these forms, DoDEA 5011 and 5013, seek supervisory and management verification of the applicant's data. DoDEA Form 5010 obtains more specific information about a teacher applicant than is required on standard Federal application forms. Such particularized application data and verification is required to comply with established procedures to obtain a quality workforce.

5. Burden on Small Businesses

This information collection does not impose an economic impact on small businesses or entities.

6. <u>Less Frequent Collection</u>

Information is only collected as required. If the collection of information required by these forms were not accomplished, DoDEA would not have the information needed to recruit and employ qualified educators.

7. <u>Paperwork Reduction Act Guidelines</u>

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 Wednesday, March 22, 2023. The 60-Day FRN citation is 88 FR 17186.

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

A 30-Day Federal Register Notice for the collection published on Friday, September 22, 2023. The 30-Day FRN citation is 88 FRN 65375.

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 provided to all respondents at the top of the Forms. The information collection does not ask the respondents to submit proprietary or trade secret information to DoDEA.

A copy of the System of Record Notices (SORN) may be found online at:

 $\frac{https://www.opm.gov/information-management/privacy-policy/sorn/opm-sorn-govt-1-general-personnel-records.pdf}{}$

https://www.opm.gov/information-management/privacy-policy/sorn/opm-sorn-govt-5-recruiting-examining-and-placement-records.pdf

This information collection requires a Privacy Impact Assessment (PIA). A copy of the PIA may be found online at:

https://www.dodea.edu/Offices/ExecutiveServices/privacy.cfm

The following File Numbers and disposition instructions from the OSD Records Disposition Schedules, Record Group 330, apply to this collection:

FN 202-07 (Temporary. Review annually at the end of each year and destroy superseded documents. Cut off file when employee separation or transfer and destroy remaining documents 1 year after cutoff).

FN 202-08.1 (Temporary. Cut off after selection certificate is closed or final settlement of any associated litigation; whichever is later. Destroy 2 years after cutoff).

FN 202-08.2 (Temporary. Cut off after termination of register. Destroy 2 years after cutoff).

FN 202-08.3 (Temporary. Cut off after candidate enters on duty, is no longer under consideration, or declines offer. Destroy 5 years after cutoff).

FN 202-08.4 (Temporary. Cut off after candidate enters on duty, is no longer under consideration, or declines offer. Destroy 2 years after cutoff).

11. Sensitive Questions

DoDEA Forms 5010, 5011, and 5013 asks applicants to provide their SSN.

12. Respondent Burden and its Labor Costs

Part A: ESTIMATION OF RESPONDENT BURDEN

- 1) [DoDEA Form 5010]
 - a) Number of Respondents: 6,000
 - b) Number of Responses Per Respondent: 1
 - c) Number of Total Annual Responses: 6,000
 - d) Response Time: 30 minutes
 - e) Respondent Burden Hours: 3,000 hours

[DoDEA Form 5011]

- a) Number of Respondents: 6,000
- b) Number of Responses Per Respondent: 3
- c) Number of Total Annual Responses: 18,000
- d) Response Time: 20 minutes
- e) Respondent Burden Hours: 6,000 hours

[DoDEA Form 5013]

- a) Number of Respondents: 6,000
- b) Number of Responses Per Respondent: 5
- c) Number of Total Annual Responses: 30,000
- d) Response Time: 5 minutes
- e) Respondent Burden Hours: 2,500 hours
- 2) Total Submission Burden (Summation or average based on collection)
 - a) Total Number of Respondents: 6,000
 - b) Total Number of Annual Responses: 54,000

Part B: LABOR COST OF RESPONDENT BURDEN

- 1) [DoDEA Form 5010]
 - a) Number of Total Annual Responses: 6,000
 - b) Response Time: 30 minutes
 - c) Respondent Hourly Wage: \$24.81
 - d) Labor Burden per Response: \$12.30
 - e) Total Labor Burden: \$73,800

[DoDEA Form 5011]

- a) Number of Total Annual Responses: 18,000
- b) Response Time: 20 minutes
- c) Respondent Hourly Wage: \$24.81

d) Labor Burden per Response: \$8.20

e) Total Labor Burden: \$147,600

[DoDEA Form 5013]

a) Number of Total Annual Responses: 30,000

b) Response Time: 5 minutes

c) Respondent Hourly Wage: \$24.81

d) Labor Burden per Response: \$2.05

e) Total Labor Burden: \$61,500

2) Overall Labor Burden

a) Total Number of Annual Responses: 54,000

b) Total Labor Burden: \$282,900

The Respondent hourly wage was determined by using the 9th paygrade in the General Schedule (GS) pay scale, approximately \$24.81 per hour (\$.41/min).

13. Respondent Costs Other Than Burden Hour Costs

Mailing and copying of DoDEA Forms 5010, 5011, and 5013 is not a financial consideration as applicants are now able to scan and attach these forms to their online EAS application.

Official transcripts are required of applicants who are selected for hire. This amounts to approximately 1,000 applicants per year.

*Transcripts: Average cost (\$20 per transcript x 1,000 applicants) = \$20,000.

*Praxis Exam: Applicants who must provide PRAXIS results normally number less than 10% of all applicants (6,000), or 600 applicants x average cost (\$150 per Praxis exam) = \$90,000.

Total cost: \$110.000.

14. Cost to the Federal Government

Part A: LABOR COST TO THE FEDERAL GOVERNMENT

1) [DoDEA Form 5010]

- a) Number of Total Annual Responses: 6,000
- b) Processing Time per Response: 15 minutes
- c) Hourly Wage of Worker(s) Processing Responses: \$38.92
- d) Cost to Process Each Response: \$9.73
- e) Total Cost to Process Responses: \$58,380

[DoDEA Form 5011]

a) Number of Total Annual Responses: 18,000

- b) Processing Time per Response: 30 minutes
- c) Hourly Wage of Worker(s) Processing Responses: \$38.92
- d) Cost to Process Each Response: \$19.46
- e) Total Cost to Process Responses: \$350,280

[DoDEA Form 5013]

- a) Number of Total Annual Responses: 30,000
- b) Processing Time per Response: 30 minutes
- c) Hourly Wage of Worker(s) Processing Responses: \$38.92
- d) Cost to Process Each Response: \$19.46
- e) Total Cost to Process Responses: \$583,800
- 2) Overall Labor Burden to the Federal Government
 - a) Total Number of Annual Responses: 54,000
 - b) Total Labor Burden: \$992,460

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: \$992,460
- 2) Total Operational and Maintenance Costs: \$0
- 3) Total Cost to the Federal Government: \$992,460

15. Reasons for Change in Burden

The burden has changed since the previous approval due to internal recalculation of the labor cost of each response. Overall burden is reduced as a result of the removal of DoDEA Form 5012.

16. Publication of Results

The results of this information collection will not be published.

17. <u>Non-Display of OMB Expiration Date</u>

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.