

## Supporting Statement for Paperwork Reduction Act Submissions

**Title: Reinstatement of a Previously Approved Collection with Revisions, OPM 1300 (Presidential Management Fellows (PMF) Program Annual Application)**

**OMB Control Number: 3206-0082**

### 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.

The Presidential Management Fellows (PMF) Program is the Federal Government's premier leadership development program for advanced degree candidates across all academic disciplines and all segments of society. The PMF Program was established by President Carter via Executive Order 12008 in 1977. The current governing Executive Order over the PMF Program is Executive Order 13562, "Recruiting and Hiring Students and Recent Graduates," published on December 27, 2010, by President Obama. Current Federal regulations that govern the PMF Program, part of the Pathways Programs, can be found at 5 CFR part 362, subparts A and D.

The collection currently under review is a "Reinstatement of a Previously Approved Collection with Revisions."

Revisions to the data collection listed within the categories of records for this system include the following: (1) the collection of Applicant Flow Data in the PMF Talent Management System (TMS) in accordance with EEOC's OMB Approval 3046-0046; (2) OPM's Systems of Record Notice OPM GOVT-7 (Applicant Race, Sex, National Origin and Disability Status Records; <https://www.opm.gov/information-management/privacy-policy/sorn/opm-sorn-govt-7-applicant-race-sex-national-origin-and-disability-status-records.pdf>) and OPM CENTRAL-11 (Presidential Management Fellows (PMF) Program Records; <https://www.opm.gov/information-management/privacy-policy/sorn/opm-sorn-central-11-presidential-management-fellows-pmf-program-records.pdf>); (3) the added collection of undergraduate transcripts to give Federal agencies additional information on the academic backgrounds of Finalists; (4) the added collection of preferred geographic locations where Finalists would like to be appointed as Fellows; (5) a process for applicants to request a reasonable accommodation for the assessment process; (6) a series of permission questions for applicants to opt-in/-out; (7) implemented two-factor authentication; (8) a Semi-Finalist stage to participate in a structured interview assessment where scores are factored into the selection of Finalists; (9) an online scheduling tool for Semi-Finalists to schedule their structured interview assessment and any request for a reasonable accommodation; and, (10) the ability for applicants to monitor the status of their application.

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 collected is used by OPM's PMF Program Office to obtain applicant data in support of a worldwide competitive selection process. Notices are sent to educational institutions and other academic stakeholders announcing the application period each year and posted to the PMF Program's website at [www.pmf.gov](http://www.pmf.gov).

Students must complete an advanced degree (master's, law, or doctoral-level degree) from a qualifying college or university during the academic year or have completed a qualifying advanced degree within the prior two years of the announcement opening. A Job Opportunity Announcement is posted on USAJOBS and on the PMF website announcing the PMF Program's annual application. Applicants will access and complete the online application via a link to the PMF Talent Management System (PMF TMS).

Applicants will complete an online assessment in order to be considered as a Semi-Finalist. Semi-Finalists are invited to participate in an audio-only structured interview assessment process via telephone. Selection as a Finalist is based on a review of the Semi-Finalist's overall assessment results (including any adjustments based on adjudicated veterans' preference), their eligibility based on advanced degree, and the total number of Finalists authorized for a given class year.

Participating agencies are informed of the list of Finalists. The Finalists' resumes and transcripts may be viewed by registered Federal agency users interested in appointing Finalists as Fellows in the PMF TMS. The Finalist's application documents are maintained on the secured PMF TMS, which is FedRAMP certified.

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.

Applicants will access the electronic PMF Talent Management System (TMS) application through a link on a USAJOBS announcement and/or on the PMF website. All applicant data is entered in the electronic system. Applicants are required to include both a resume and an advanced degree transcript in their application. They may upload such documents into the PMF TMS or fax it with a pre-populated cover sheet that will then be added by the PMF Program Office to their application. Applicants who are current graduates and do not have complete advanced degree transcripts may submit an alternative letter from their academic institution, or combination of.

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.

Applicants are required to provide the last four digits of their Social Security Number (SSN), which assists in uniquely identifying applicants. Duplicates are checked by matching an Applicant's first/last name, email address, and last four of their SSN. The PMF application process is a standalone system and is not integrated with other application systems.

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

There is no impact on small businesses or other small entities.

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

The collection of this information is essential to facilitate an applicant's participation in the PMF Program and the annual selection and placement of Finalists into Federal agencies as Fellows.

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 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.

This data collection has no impact on the above items.

8. Federal Register Notice: Provide a copy and identify the date and page number of publication in the Federal Register of the agency's notice soliciting comments on the information collection prior to submission to OMB.

The 60-day notice and request for comments was posted to the Federal Register on 04/20/2023, Volume 88, Number 76, Pages 24454-24455, and can be found at <https://www.federalregister.gov/documents/2023/04/20/2023-08350/submission-for-review-reinstatement-of-a-previously-approved-collection-with-revisions-presidential>.

The 30 Day FRN was posted to the Federal Register on 08/03/2023, Volume 88, Number 148, Pages 51360, and can be found at <https://www.govinfo.gov/content/pkg/FR-2023-08-03/pdf/2023-16554.pdf>

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

There is no payment or gift to respondents.

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

The PMF TMS (Talent Management System) is a secured system that is FedRAMP certified and utilizes two-factor authentication upon login.

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.

Questions asked during the annual PMF application pertain to program and employment eligibility. There are no questions of a sensitive nature asked during the application process.

12. Provide estimates of the hour burden of the collection of information. The statement should:
- a. 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 desired. 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.

b. 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.

c. 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.

We estimate, on average from the past 5 years, up to 7,000 respondents may apply to the annual PMF application. We estimate it will take applicants up to 30 minutes for applicants to read the instructions, reply to questions, and upload supporting documentation in order to complete the application portion. The annual estimated burden for completing the application is 3,500 hours.

Type of Respondent	Collection Name	No. of Respondents	No. of Responses per Respondent	Avg. Burden per Response (in hours)	Total Annual Burden (in hours)
Selectees for Federal Employment	Annual PMF Application	7,000	1	30 minutes	3,500 hours

13. Provide an estimate of the total annual cost burden to respondents or recordkeepers 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: (1) 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 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 to keep records for the government, or (4) as part of customary and usual business or private practices.

Type of Respondent	Form Name	No. of Respondents	Total No. of Responses	Avg. Burden per Response (in hours)	Hourly Wage Rate	Total Respondent Costs
Selectees for Federal Employment	OPM 1300, Annual PMF Application	7,000	1	.5	\$19.11	\$143,325

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 have been incurred without this collection of information. You may also aggregate cost estimates for Items 12, 13, and 14 in a single table.

The PMF Program Office contracts the hosting and maintenance of the annual PMF application process, including the adjudication process, at an estimated annual cost of \$116,354. This cost includes the hosting and maintenance of the talent management system to collect information from applicants for the annual PMF application, adjudicate applicants, provide technical help desk support, to provide accessibility assistance (e.g., ensuring the application is 508 compliant), and selection of Finalists.

15. Explain the reasons for any program changes or adjustments reported in Items 13 or 14 of the OMB Form 83-I. Changes in hour burden, i.e., program changes or adjustments made to annual reporting and recordkeeping **hour** and **cost** burden. A program change is the result of deliberate Federal government action. All new collections and any subsequent revisions of existing collections (e.g., the addition or deletion of questions) are recorded as program changes. An adjustment is a change that is not the result of a deliberate Federal government action. These changes that result from new estimates or actions not controllable by the Federal government are recorded as adjustments.

The annual PMF application typically takes place over a two-week period in the fall; application stage. Shortly after the application closes we adjudicate applicants for complete applications, eligibility, assessment scores, and selection of Semi-Finalists, which can take up to two-weeks; adjudication stage. Semi-Finalists participate in a structured interview assessment. Assessment scores are applied for Semi-Finalists, leading to the selection of Finalists. The selection process takes approximately two-weeks; selection stage. Finalists are then eligible for PMF appointments with participating Federal agencies. We estimate the total number of hours for the above at 240 hours.

Stage	Defined	Cost
Application	Two staff monitor the application, address questions, provide technical support, and adjudicate requests for reasonable accommodations (one at the GS-13-1 Washington, DC Hourly Rate of \$53.67 and one at the GS-14-1 Washington, DC Hourly Rate of \$63.43; $\$53.67 + \$63.43 = \$117.10 \times 80 \text{ hours} = \$9,368$ )	\$9,368
Adjudication	Average of 5.02 FTE staff to adjudicate over a two-week period ( $5.02 \times \text{an average GS-12-1 Washington, DC Hourly Rate of } \$45.14 \times 80 \text{ hours} = \$18,128$ )	\$18,128
Selection	We estimate the selection and announcement of Finalists to take two-weeks. Same staff for Application Stage, plus a GS-15-1 Washington, DC Hourly Rate of $\$74.60 \times 80 \text{ hours} = \$5,968$ . Application stage staff (\$9,368) + GS-15 (\$5,968) = Total \$15,336	\$15,336
<b>TOTAL:</b>		<b>\$42,832</b>

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.

During the application process, Applicants are asked to provide their consent to be publicly listed on the PMF website if selected as Finalists. Only their name, academic institution, advanced degree, status (if

they withdraw or obtain a PMF appointment), and, if appointed as a Fellow, at what agency and the start date of their fellowship. Upon OPM selecting Finalists, the list is instantly displayed. Finalists may also opt-out to be listed at any time. The public list is deactivated upon the expiration of the appointment eligibility period of all Finalists.

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

We are planning to advertise the OMB approval and expiration date.