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      </b>8/17/26, 5:20 PM <br/>
<b>Received: </b>August 16, 2026
      <br/>
<b>Status: </b>Posted <br/>
<b>Posted: </b>August 17, 2026
      <br/>
<b>Category: </b>Agency <br/>
<b>Tracking No. </b>msw-lx7l-1gte
      <br/>
<b>Comments Due: </b>September 03, 2026 <br/>
<b>Submission
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<p><b>Docket: </b>OPM-2026-0001 <br/>
2026 PRA Umbrella
</p>
<p><b>Comment On: </b>OPM-2026-0001-0022 <br/>
Agency Information
Collection Activities; Proposals, Submissions, and Approvals:
Optional Form 306, Declaration for Federal Employment
</p>
<p><b>Document: </b>OPM-2026-0001-0046 <br/>
Comment from Reggie
Greenwood
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<h2 class="western">Submitter Information</h2>
<p><b>Name: </b>Reggie Greenwood <br/>
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<p>Tampa,&nbsp; FL,&nbsp; 33612</p>
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</p>
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<h2 class="western">General Comment</h2>

<p>OPM Information Collection – Optional Form 306 (OF 306),
Declaration for Federal Employment, OMB Control No. 3206-0182

I
respectfully submit this comment regarding the Office of Personnel
Management's proposed renewal, without change, of Optional Form 306
(OF 306), Declaration for Federal Employment.

I recognize
OPM's legitimate need to collect information necessary to determine
an individual's acceptability for Federal employment and Federal
contract employment. However, renewal of an existing information
collection without modification should not substitute for a
substantive reassessment of whether each data element remains
necessary, proportionate, appropriately protected, and consistent
with contemporary Federal privacy and information-security
requirements.

1. Data Minimization and Continued
Necessity

OPM should conduct and document a
data-element-level review of OF 306 to determine whether every
requested item continues to have demonstrable practical utility. The
form collects highly sensitive personally identifiable information
(PII), including Social Security numbers, birth information,
military-service information, criminal-history information,
employment-separation information, and Federal debt information.

OPM should explain whether less-sensitive identifiers,
verification mechanisms, or authoritative government data sources
could accomplish portions of the same function without requiring
applicants to repeatedly provide sensitive information.

2.
Privacy Act and Secondary Use

OPM should ensure that
applicants receive clear, current, and understandable notice
regarding how OF 306 information may be maintained, accessed,
disclosed, matched, transferred, or reused after its original
collection.

Particular attention should be given to
routine uses, interagency disclosures, contractor access, automated
information exchanges, and computer-matching activities. Applicants
should be able to understand not merely why the information is
initially collected, but the reasonably foreseeable lifecycle of that
information across Federal systems.

3. Retention, Access
Controls, and Cybersecurity

Given the sensitivity of OF
306 information, OPM should identify the applicable retention
requirements and periodically evaluate whether continued retention
remains necessary. Access should be governed by least-privilege and
need-to-know principles, with appropriate authentication, audit

logging, monitoring, encryption, and mechanisms for investigating unauthorized access or disclosure.

OPM should also

evaluate whether retaining complete OF 306 records is necessary when specific information has already been independently verified.

4.

Accuracy and Applicant Due Process

Information collected

through OF 306 can materially affect employment and suitability determinations. OPM should ensure that applicants have effective procedures to identify and correct inaccurate, incomplete, outdated, or improperly attributed information before adverse determinations are made, consistent with applicable law.

5. Paperwork

Burden

OPM should reassess whether its burden estimate accurately reflects the actual time required to review instructions, research historical records, obtain supporting documentation, explain responsive answers, resolve uncertainty, and review the completed submission for accuracy.

The burden associated with

sensitive Federal employment forms is not necessarily limited to the time required to enter information into individual fields.

Conclusion

I recommend that OPM not treat

renewal "without change" as evidence that the existing collection remains optimally designed. OPM should use the Paperwork Reduction Act review process to affirmatively evaluate data minimization, practical utility, privacy risk, retention, cybersecurity, information sharing, applicant due process, and actual respondent burden.

Continued collection may be justified,

but that justification should be supported by a current assessment of necessity and risk rather than reliance solely on historical approval.

Thank you for considering these comments.

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