

SUPPORTING STATEMENT
FOR PAPERWORK REDUCTION ACT SUBMISSION

Annual Employee Survey (AES)

OMB #3206-NEW (OPM-AES)

A. JUSTIFICATION

- 1. Explain the circumstances of this collection, why this collection is necessary, and the legal statutes that allow it.*

This collection is conducted under the authority of section 1128 of the National Defense Authorization Act for Fiscal Year 2004 (Pub. L. 108-136; 5 U.S.C. 7101 note). Section 1128 requires executive agencies to conduct an annual employee survey to evaluate leadership and management practices and employee satisfaction on five specific topics. The statute orders OPM to prescribe a set of common survey questions, which were implemented at 5 CFR part 250, subpart C.

After the passage of section 1128, the U.S. Office of Personnel Management (OPM) administered two multi-year governmentwide surveys: the Federal Human Capital Survey (FHCS) in 2004, 2006, and 2008, and its successor the Federal Employee Viewpoint Survey (FEVS) from 2010 to 2024. The FHCS and FEVS were part of a larger survey effort done by OPM to collect a variety of human capital-related information across the government, incorporating the required items to reduce respondent survey fatigue, reduce administrative burden for agencies, and as an incentive for agencies to participate in the data collection effort.

OPM is requesting a new OMB control number (3206-NEW) because it is (1) reducing the number of prescribed annual employee survey questions from 16 to 10, retaining the items of greatest utility for workforce planning, and (2) ending OPM's central administration of the survey — each agency will now administer the survey directly to its own employees using a common form that OPM will provide.

- 2. Describe how, by whom, and for what purpose the information is to be used. Except for a new collection, describe how the agency has made use of the information received from the current collection.*

Each agency will administer the common-form items prescribed in 5 CFR part 250, subpart C, to its own employees, using whichever methodology best suits the agency. The common-form survey items use Likert-type, mark-one, and mark-all-that-apply response scales that employees will use to respond to the survey items. Upon completion of their annual employee survey, agencies submit the survey data to OPM and OMB. This will allow for cross-agency comparisons and for OPM and OMB to fulfill their statutory purpose in overseeing federal human capital practices. Agencies themselves will use the results of the survey for workforce planning regarding leadership and management practices, employee satisfaction with leadership policies and the work environment,

rewards and recognition, professional development opportunities, and employees' sense of contribution to the agency mission, consistent with the requirements of section 1128.

3. How are the respondents expected to complete the collection? Can this collection be completed electronically (e.g., through a website or application)?

The survey is anticipated to be completed electronically through a web-based platform. Each agency will determine which platform best suits its administration of the survey.

4. Does this collection duplicate any other collection of information? Describe why the federal government or agency doesn't already have this information within their systems.

No. The common form is the sole mechanism by which agencies satisfy the section 1128 annual employee survey requirement, and it is designed to prevent duplicative agency-run leadership/engagement surveys for the prescribed core questions. An agency that wishes to add questions beyond the 10 prescribed items, as is allowed in section 1128(a), must follow OMB guidance with respect to the Paperwork Reduction Act, as necessary.

5. Describe any impacts on small business. If applicable, describe any methods used to minimize those impacts.

Not applicable. The common form is applicable only to federal employees.

6. What are consequences to the Federal program or policy goals if this collection is not done or the information is collected less frequently? Describe any technical or legal obstacles to reducing burden.

Without this collection, agencies could not satisfy the statutory requirement in section 1128 of the FY2004 NDAA to annually assess leadership and management practices and employee satisfaction with the work environment, rewards and recognition, and professional development. OPM, agency leadership, and Congress would also lose the only governmentwide dataset used for oversight and workforce planning. No technical or legal obstacles to reducing burden have been identified. The reduction in prescribed questions from 16 to 10, already reflected in this collection, represents the burden reduction available without compromising the statutory purpose of section 1128.

7. Do any of the following special circumstances apply?

- 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.*

None of the special circumstances listed above apply to this collection.

8. *Cite the Federal Register publication for a request for public comments and address any comments received.*

OPM published a 30-day notice requesting public comment on this new information collection at 91 FR 40599 (July 2, 2026) (FR Doc. 2026-13443; Docket ID OPM-2026-0001, Document ID OPM-2026-0001-0029). The comment period closed August 31, 2026, and OPM received 13 unique public comments and one duplicative comment.

PUBLIC COMMENTS:

OPM received 13 unique public comments and one duplicative comment in response to the 60-day notice (91 FR 40599) for this collection. Of these, three comments addressed matters within the scope of this Paperwork Reduction Act review; those comments and OPM's responses are summarized below. The remaining comments addressed the substance of the underlying rule at 5 CFR part 250, subpart C, including the transition from an OPM centralized administered surveys to individual agency-administered surveys, and the reduction in the number of prescribed items. These concerns are already addressed in the final rule (RIN 3206-AO77).

Commenter 0044 argued that OPM's burden estimate for this collection should account for more than the time employees spend answering the ten prescribed questions, and urged OPM to distinguish "respondent burden" from the broader administrative burden agencies will bear under decentralized administration including survey configuration, cybersecurity and privacy controls, accessibility, technical support, data validation, and reporting and to adopt governmentwide technical standards to preserve comparability across agencies.

OPM's burden estimate follows 5 CFR 1320.3(b), which defines "burden" as the time and effort respondents, in this case the employees completing the survey—, spend providing information. It does not extend to an agency's internal administrative costs of operating a program; those costs fall outside the scope of the burden definition. The commenter's related request that OPM adopt governmentwide technical standards concerns the design and administration of agency surveys rather than the burden estimate in this collection. Accordingly, revision of the burden estimate is not warranted.

Commenter 0049 asserted that decentralized administration undermines the PRA's practical utility standard. In the commenter's view, employees will distrust confidentiality once their own agency's leadership controls both the survey and the

resulting data; responses will therefore be distorted or withheld; and the data will fail to measure what section 1128 requires—leadership practices, work environment, and recognition. On that reasoning, comparability across the ten retained questions is meaningless if the underlying answers are not candid.

Concerns about confidentiality are not new; employees have expressed similar apprehension under centralized administration. Candor is protected by confidentiality safeguards—suppression thresholds, access controls, disclosure-avoidance procedures, and a prohibition on using identifiable responses for personnel actions—rather than by the identity of the entity administering the survey. These safeguards apply regardless of whether OPM or the agency administers the collection. A well-protected, agency-administered survey meets the practical utility standard that section 1128 requires.

Commenter 0051 stated that a collection that does not measure what the statute directs agencies to measure lacks the practical utility the Paperwork Reduction Act requires.

The ten retained questions map directly to the constructs section 1128 directs agencies to assess: employee satisfaction with leadership policies and practices, the work environment, and rewards and recognition for professional and personal contributions to the mission. Reducing the number of questions does not abandon those constructs; it retains the most probative item for each one and removes redundant or lower-value items that added respondent burden without adding statutory coverage. The collection therefore satisfies the practical utility standard.

Addressing Comments Related to the Federal Employee Viewpoint Survey

Almost all the public comments were either specifically about the FEVS or made a point to mention the FEVS (comments 0030, 0031, 0032, 0033, 0034, 0035, 0044, 0045, 0048, 0049, 0050, 0051, 0052). These comments were generally supportive of continuing the FEVS as a larger governmentwide survey administered centrally at OPM and criticized reducing the number of survey items and changing the methodology. Most of these comments are not directed to the content of this PRA notice but rather to the 5 CFR part 250 proposed rule that changes many aspects of the part 250 regulation, including the required survey items found in Subpart C—Employee Surveys. This proposed rule was out for public comment approximately at the same time as the PRA public notice.

Almost all the FEVS-related content in these comments is addressed in the response to comments accompanying the 5 CFR part 250 final rule. The only exception is comment 0035, which raises agency burden associated with having conducted a survey that did not include the ten items finalized in this collection. The statute, which requires agencies to conduct an annual employee survey, instructs that the survey must include the items OPM prescribes in regulation.

9. Are payments or gifts given to the respondents?

No payments or gifts are provided to respondents.

10. Describe any assurances of privacy/confidentiality. Cite specific privacy laws, relevant OPM regulations, and SORNs.

Individual survey responses are used only in aggregate, statistical form (counts, percentages, averages) and are not attributed to individual respondents in reporting. This

information collection is protected by the Privacy Act of 1974 and OPM regulations (5 CFR 5.2(b) and 9.2). The routine uses of disclosure appear in the Federal Register posting of Central-21, Federal Employee Viewpoint Survey at 82 FR 57489 (12/5/2017).

11. Are any questions of a sensitive nature asked, such as sexual behavior and attitudes, religious beliefs, and other matters that are commonly considered private? If yes, provide justification. 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.

No. The survey does not ask about sensitive personal matters.

12. Describe the hour time burden and the hour cost burden on the respondent needed to complete this collection. Please specify hourly salary for your respondent audience by referencing [Bureau of Labor Statistics Occupational Employment and Wage Estimates](#) or other alternative wage site, when applicable.

Per OPM's 30-day Federal Register notice, OPM estimates a maximum of 1,990 respondents (depending on survey eligibility criteria and agency response rate), an average of 5 minutes (0.083 hours) per respondent, for a total of 165.83 annual burden hours, as reflected in the table below.

Form Name	No. of Respondents	Average Burden per Response (in hours)	Total Annual Burden (in hours)	Average Hourly Wage Rate	Total Annual Respondent Cost
Annual Employee Survey Common Form	1,990	0.083 (5 min.)	165.83	\$48.45	\$8,034.46

13. Describe the non-hourly monetary burden to respondents needed to complete this collection. This is defined as out-of-pocket costs such as application fees for the collection, document fees ([birth/death certificates](#), school transcripts), mailing costs ([printing](#), [postage](#), and/or [mileage](#)), or anything else respondents may need to pay to complete and/or implement the collection.

None. There are no fees, materials, postage, or other out-of-pocket costs to respondents for completing the survey.

14. Describe the cost incurred by the Federal Government to administer this collection.

Form Name	Total number of responses in 12-month timeframe	Total number of hours for programming and	Total number of hours for processing and	Annual cost per hour	Total Annual Cost
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		administering survey (in hours)	reporting on response data (in hours)		
Annual Employee Survey Common Form	1,990 (approximate maximum, depending on eligibility criteria and response rate)	2	32	\$97.86	\$3,327.20

15. Explain any changes/adjustments to this collection since the previous submission, if applicable. Describe whether these changes impact the hour or cost burden. If yes, describe if the impact is the result of deliberate Federal government action (“program change”) or something else (“adjustment”).

Not applicable as this is a new collection.

16. Specify if the data gathered by this collection will be published. This could include Congressional reporting, using respondent numbers in budget justification, or other broad reporting.

Yes. OPM will compile aggregate, governmentwide results for the 10 prescribed questions annually for cross-agency comparison and use them in workforce-planning reporting to agency leadership, OMB, and Congress. Those results may also be referenced in OPM's public reporting on the Federal workforce. Individual employee responses are not published.

17. If applicable, explain the reason(s) for seeking approval to not display the OMB expiration date.

Not applicable. OPM is not seeking approval to omit display of the OMB expiration date.

18. Explain each exception to the topics of the certification statement identified in “[Certification for Paperwork Reduction Act Submissions](#).”

None. OPM is not aware of any exceptions to the topics of the Certification for Paperwork Reduction Act Submissions.

B. Collection of Information Employing Statistical Methods

See attached Statement B.