

General Services Administration
OMB Control No. 3090-0331
Living Quarters Eligibility Questionnaire; GSA Form 5039
Justification – Part A Supporting Statement

Overview of Information Collection:

This information collection activity concerns a revision to an agency-specific form, **GSA Form 5039, *Living Quarters Allowance Eligibility Questionnaire***. This form is completed by job candidates who have been selected for appointment, reassignment, promotion, or transfer to civil service positions in foreign areas (i.e., outside the United States and its territories and possessions). The living quarters allowance is an authority that allows an agency to reimburse the hired employee for the cost of rent and utilities for private housing in an overseas area.

The purpose of the form is to collect information necessary to determine eligibility for living quarters allowance, under sections 031.12 and 130 of the Department of State Standardized Regulations (DSSR).

Following the public comments period, several changes were made to the form as recommended by the public commenters:

- Incorporated a new section with easy-to-understand definitions for three terms of art.
- Incorporated a new section summarizing Department of State regulations on allowance eligibility in lay language.
- Increased the Paperwork Reduction Act estimated burden per respondent to 2 hours.

1. Need & Method for the Information Collection.

The information collected on this form will be used to determine eligibility for the living quarters allowance for foreign areas. The Department of State regulations for this authority require that the employee be recruited from the U.S., or, if already abroad, originally recruited from the U.S. and in continuous employment with the Federal Government overseas with a transportation agreement that establishes an employee's entitlement to return relocation at the end of the foreign tour of duty. To satisfy this requirement, the job candidate must be able to demonstrate a continuous employment history with the U.S. government overseas as well as an existing transportation agreement with another agency (if transferring to GSA).

The job candidate's employment history will be collected, and the job applicant will sign the GSA Form 5039 certifying to the correctness of the information. The human resources staffing specialists within the Office of Human Resources, as well as the hiring manager, will oversee the collection and recording of the information. This will be a fillable form and once signed will be stored within the "Overseas Employment" folder within the Electronic Personnel Folder (eOPF). The form itself will be fillable (in Adobe Acrobat).

2. Use of the Information.

The information collected in the form will be used to accomplish several purposes. First, the information is used to determine eligibility for the living quarters allowance.

The information collected will also be used to complete the SF-50, *Notification of Personnel Action*, and the SF-52, *Request for Personnel Action* which are forms used as part of the recruitment action. These forms are input into personnel systems such as PeopleSoft ERP, which is used at GSA to manage employee and payroll records.

The GSA Form 5039 is considered an agency-only, or “temporary” form and is not provided to any other agency. Upon separation, the records in the electronic personnel file are not transmitted to the gaining agency (during agency transfer). Therefore, the GSA Form 5039 has an agency-specific purpose to document eligibility for the living quarters allowance.

3. Use of Information Technology.

GSA Form 5039 will be filled out on paper or will be completed as a fillable digital form via Adobe Acrobat. A digital copy of the form can be downloaded via the [GSA Forms Library](#). The information recorded in this form represents data elements that are then entered into the printable fields of the SF-50, *Notification of Personnel Action* or the non-printing fields of that form or the unprinted data elements in the payroll processing system.

4. Non-duplication.

This GSA Form 5039 is unique because it collects important information necessary for the accurate recording of personnel and payroll information related to foreign employment. The existing general form, SF-52, *Request for Personnel Action*, does not include most of the data fields needed for the purpose of identifying eligibility for the living quarters allowance.

5. Burden on Small Business.

The GSA Form 5039 will not be completed by small businesses. It will only be used by the very small number of job applicants each year who are selected to overseas positions at GSA (estimated at 25 or less annually).

6. Less Frequent Collection.

The data will only be collected once per selected job applicant. If the data collection is not conducted, the likelihood of compensation and leave errors for individuals hired for overseas positions will remain at a high level (estimated at approximately 50%).

7. Paperwork Reduction Act Guidelines.

It is expected that if this form is used during the job candidate selection process that the candidate selected could be allowed for up to 30 calendar days to work with the assigned human

resources staffing specialist to complete and then sign a final and verified copy of the GSA Form 5039. We believe it would take a respondent about 1 hour to complete the form and 1 hour to locate other documents that would either be used as attachments or as sources of information needed to complete certain fields on the form.

8. Consultation and Public Comments.

A 60-day notice was published in the Federal Register at 91 FR 9852 on February 27, 2026. Three comments were received that contained a total of six (6) suggestions, all of which we found very helpful.

First, a commenter suggested that within the form we could briefly summarize the Department of State eligibility criteria so that users of the form would not have to independently search elsewhere. Second, a commenter suggested that we add a new section to provide definitions of three significant terms: “actual place of residence,” “personal reasons,” and “single employer test.” Third, a commenter suggested that we incorporate a document attachment checklist. A fourth comment was that we should increase the time burden estimate because of the need to locate and attach outside documents to the GSA form. The commenters also suggested that the form completion process could be automated, by developing a system to both pre-fill the demographic data and then electronically transmit the form to the agency.

We have implemented several of these suggestions by revising the form in ways to include additional information. First, we have incorporated a new section that provides easy-to-understand definitions for the three terms of art identified by the commenter. We also have incorporated a new section that summarizes, in lay language, the Department of State regulations that govern allowance eligibility. For the third comment, to add a checklist, we note that Section D of the form already includes a checklist. We believe that this existing checklist should be sufficient. For the fourth comment, regarding time burden, we agree, and have therefore doubled the estimated time to a total of 2 hours: 1 hour to complete the form and then a separate hour to locate and collect other supplementary documents, when they are needed. In terms of the two comments concerning automation of the completion and submission process, at GSA specifically, we do not currently have an existing information technology system that could serve this purpose. At GSA, since we currently have fewer than 25 employees annually transferred or hired for overseas work, the cost of this automation would most likely exceed the cost savings in labor hours from that automation.

We thank the commenters for their helpful feedback.

A 30-day notice was published in the *Federal Register* at 91 FR 66706 on October 22, 2026.

9. Gifts or Payment.

There is no gift or incentive that would be offered to complete the GSA Form 5039.

10. Privacy & Confidentiality.

This GSA Form 5039 is used to collect demographics and employment history information. The information will be handled in a manner similar to other personnel and payroll information, in the context of “personally identifiable information” (PII) as protected by the Privacy Act of 1974. The information will be keyed into personnel and payroll data systems, for secure storage, and the form itself will be scanned and stored into the official Electronic Personnel File, a system that is owned and operated by the Office of Personnel Management.

Records are covered by OPM's governmentwide System of Records Notice (SORN) OPM/GOVT-1 General Personnel Records (77 FR 73694 (12/11/2012), 87 FR 5874 (2/2/2022), and 88 FR 56058 (8/17/2023)), posted at <https://www.opm.gov/information-management/privacy-policy/sorn/opm-sorn-govt-1-general-personnel-records.pdf>. The Privacy Impact Assessment (PIA) for the Electronic Official Personnel Folder is posted at <https://www.opm.gov/information-management/privacy-policy/privacy-policy/eopf-pia.pdf>.

11. Sensitive Questions.

None of the questions are of a sensitive nature – the questions relate to the job candidate’s employment history, particularly if already overseas. There is no medical information contained in this form.

12. Burden Estimate.

Burden per Response:

	Time Per Response	Hours	Cost Per Response
Reporting	2 hours	2 hours	
Record Keeping	0	0	0
Third Party Disclosure	0	0	0
Total	2 hours	2 hours	0

Annual Burden:

	Annual Time Burden (Hours)	Annual Cost Burden (Dollars)
Reporting	50 hours	0
Record Keeping	0	0
Third Party Disclosure	0	0
Total	50 hours	0

13. Estimated non-recurring costs.

There are no non-recurring costs.

14. Estimated cost to the Government.

It is expected that the cost of the Government would be the hours needed to process the data collected on the form. If the processing of the data requires 30 minutes each, and there are 25 forms processed per year, and if the hourly rate is \$70 per hour, then the total cost is \$875 or less per year in staff time.

15. Reasons for changes.

There are three changes: (a) the addition of a definitions section, (b) the addition of a new section discussing State Department regulations in lay-person language, and (c) an increase to the time burden for respondents completing the form.

All three changes were due to suggestions from public commenters who we believe have been former respondents of the form and the allowance approval process. They suggested additional information would be a way to provide advice on the form itself, in terms of what information is collected and why it is collected by the agency. The Paperwork Reduction Act burden was also increased because the public commenters said that it takes time to collect attachments that often must be submitted along with the form, or documents that are needed to fill out certain sections of the form.

16. Publicizing Results.

Results will not be published.

17. OMB Not to Display Approval.

Not applicable.

18. Exceptions to "Certification for Paperwork Reduction Submissions."

Not applicable

19. Surveys, Censuses, and Other Collections that Employ Statistical Methods.

Not Applicable