

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) (FY 2004 NDAA). 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 OPM survey effort to collect a variety of human capital-related information across the government, incorporating the required items to reduce respondent survey fatigue and 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 amending 5 CFR part 250, subpart C, to (1) reduce the number of prescribed annual employee survey questions from 16 to 10, retaining the items of greatest utility for workforce planning, and (2) end 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 10 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 surveys, agencies must submit the survey data for the 10 questions 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 FY 2004 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 60-day notice requesting public comment on this new information collection at 91 FR 40599 (July 2, 2026) (Docket ID OPM-2026-0001, Document ID OPM-2026-0001-0029). OPM received 13 unique public comments and one duplicative comment. Comments in response to the 60-day notice can be accessed at <https://www.regulations.gov/comment/OPM-2026-0001-nnnn>, where nnnn is the comment number provided in the following discussion.

60-DAY 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 survey to individual agency-administered surveys, and the reduction in the number of prescribed items. These concerns are 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.

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. Agencies are required to survey annually. An agency that conducted its annual survey using the questions prescribed at the time satisfied the requirement for that year. The ten prescribed items apply to any survey an agency conducts after the final rule's effective date to meet the statutory requirement. This collection therefore imposes no burden for surveys already administered, and revision of the burden estimate is not warranted.

On September 17, 2026, OPM published a 30-day notice requesting public comment on this new information collection at 91 FR 58921. Ten comments overall were received, with one comment deemed out of scope as it does not address the information collection or rule at issue and one duplicative comment.

30-DAY PUBLIC COMMENTS:

OPM received eight unique comments in response to the 30-day notice (91 FR 58921) (Docket ID OPM-2026-0001, Document ID OPM-2026-0001-0059). The areas addressed among the comments include the survey items or administration of this collection and the decentralized administration of the survey, all are addressed below. Comments submitted through [regulations.gov](https://www.regulations.gov) in response to the 30-day notice can be accessed at <https://www.regulations.gov/comment/OPM-2026-0001-nnnn>, where nnnn is the 4-digit comment number provided in the following discussion. Comments with 6-digit identification numbers were submitted on [reginfo.gov](https://www.reginfo.gov) and will be accessible on that site.

Survey Item Wording and Terminology

Several commenters raised concerns about the wording of the prescribed items. Two (Comment IDs 123717 and 014527) argued that item 5, “My supervisor holds my team accountable for achieving results,” should say “work unit” rather than “team,” because not all employees work on a team and “team” is not used elsewhere in the survey. A third, Comment ID 030308, asked OPM to clarify whether item 2, “The people I work with cooperate to get the job done,” refers to the respondent’s immediate office, external offices, or leadership, and noted that closed-ended questions do not let respondents explain their answers. Commenter 0062 said the form does not account for team leads and described “mission” as too open-ended.

The ten items are prescribed in 5 CFR 250.302(a)(2) of the final rule (RIN 3206-AO77), and the common form must present them as prescribed. The form is standardized so that agency results can be compared across government, and OPM cannot reword the items through this collection. In the final rule, OPM considered comments on item wording, concluded they reflect differences in professional judgment about survey design, and made no changes. Agencies may add their own questions under 5 CFR 250.302(a)(1), including questions that gather explanatory feedback, and OPM will continue to support them through guidance such as the Employee Survey Playbook.

Number and Content of the Prescribed Items

Commenters questioned whether ten items are enough. One, Comment ID 081302, asked OPM to show that the ten retained questions adequately measure the statutory dimensions of employee experience. Commenter 0063 argued that the reduction from 16 to 10 is premature because the survey omits well-being measures such as burnout, asked whether standardized demographic information will continue to be collected, and recommended a common set of validated measures across federal agencies. Others suggested adding an item measuring the survey’s effectiveness, modeled on FEVS item 47, and (Commenter 0062) adding fraud-related questions. Another commenter, ID 022817, argued that the reduced items eliminate every question on topics the law requires the survey to cover (work environment, rewards and recognition, and professional development), that OPM

cannot drop those topics through regulation, and that the new items turn a workplace climate survey into a tool for checking compliance. Commenter 0062 likewise stated that a regulation cannot change the words of a statute.

Section 1128(a) requires each agency to conduct an annual survey “(including survey questions unique to the agency and questions prescribed under subsection (b))” to assess leadership and management practices and employee satisfaction in the listed areas. As the final rule explains, those areas apply to the agency’s survey as a whole, not only to the questions OPM prescribes. Section 1128(b) directs OPM to prescribe questions that should appear on all agency surveys “in order to allow a comparison across agencies”; it does not require a separate question for each area or any set number of questions. Even so, the ten items reach each area: leadership and management practices (items (i), (v), (ix), and (x)); work environment (items (ii) and (viii)); rewards and recognition (item (iii)); professional development (item (iv)); and contribution to the agency’s mission (items (vi) and (vii)). The prescribed items are a floor, not a ceiling. Under 5 CFR 250.302(a)(1) and section 1128(a), agencies may add questions on burnout, engagement, well-being, workplace climate, fraud, survey effectiveness, demographics, or any other topic, subject to OMB guidance under the Paperwork Reduction Act. Proposals for a common set of validated measures concern the prescribed set rather than this collection, and OPM may consider them in future updates. OPM will also publish an item crosswalk in its implementation guidance to support measurement continuity. This collection merely implements the statute.

Decentralized, Agency Administration

Three comments addressed who should administer the survey. One, Comment 0060, supported reducing burden and giving agencies flexibility but urged independent safeguards, including governmentwide standards for question wording, distribution, data quality, confidentiality, and public reporting, as well as measures of leadership accountability and requirements that agencies connect findings to corrective action. Comment 0061 argued that transferring administration to agencies means the data will be shaped by the organizations the survey is meant to evaluate, which could fragment governmentwide measurement and weaken comparisons over time. Comment 0062 urged OPM to retain central administration of the survey.

The statute requires OPM to prescribe common questions so that results can be compared across agencies; it does not require OPM to administer each agency’s survey. The final rule (RIN 3206-AO77) preserves comparability through a common core of ten items on every agency’s survey, and agencies must submit complete results to OPM and OMB within 90 days of completing administration (5 CFR 250.303(c)). That requirement preserves centralized oversight and allows OPM to publish governmentwide comparisons. OPM will compile aggregate governmentwide results for the ten questions annually for reporting to agency leadership, and OMB, and each agency must make its results public under 5 CFR 250.303(a). Confidentiality is protected by the Privacy Act of 1974, OPM’s annual survey administration requirements, and the Employee Survey Playbook, and, as explained in the response to Commenter 0049 on the 60-day notice, by suppression thresholds, access controls, disclosure-avoidance procedures, and a prohibition on using identifiable responses for personnel actions. These safeguards apply regardless of who administers the survey. Recommendations for independent oversight,

leadership-accountability measures, and corrective-action requirements concern the administration framework in 5 CFR part 250, subpart C, which the final rule does not establish, rather than this collection.

Burden Estimate and Practical Utility

Commenter 0060 asked for a clearer explanation of the burden estimate (1,990 respondents, five minutes each, 166 total hours), including which population it measures. Commenter 0061 asserted that the Paperwork Reduction Act requires a meaningful assessment of practical utility, effective management and use, and statistical methodology (44 U.S.C. 3506(c)(3)(A), (H)–(I)) and urged OMB to examine independently whether the collection meets those requirements. Another commenter, Comment ID 022817, also stated that the revisions are not necessary for OPM’s functions and would make the information collected less useful and less clear.

OPM’s burden estimate follows 5 CFR 1320.3(b), which counts the time employees spend completing the survey: up to 1,990 respondents at five minutes each, or 165.83 annual burden hours. Agencies’ internal costs of administering and analyzing their surveys fall outside that definition, as discussed in the response to Commenter 0044. Revision of the burden estimate is not warranted. Practical utility is described in this Supporting Statement, and statistical methodology is addressed in Supporting Statement B. A well-protected, agency-administered survey that uses a common set of items meets the practical utility standard, and the collection is necessary for agencies to satisfy section 1128.

Comment Period and Timing

Commenter 0063 asked OPM to extend or reopen the comment period to allow further scientific evaluation and stakeholder input. Comment ID 022817 also stated that it was inappropriate to revise the survey form before the proposed rule was finalized.

The public had the opportunity to comment on this collection through the 60-day notice (91 FR 40599) and the 30-day notice (91 FR 58921), consistent with the Paperwork Reduction Act and 5 CFR part 1320, and the underlying rule was also open for public comment. An extension is not warranted. The final rule operates prospectively from its effective date, and agencies remain bound by the regulations in effect when a survey is administered.

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).

OPM is updating Central-21 to change the name to Annual Employee Survey to align with the revised regulations and this information collection.

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 60-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 at OPM	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 administering survey (in hours)	Total number of hours for processing and reporting on response data (in hours)	Annual cost per hour	Total Annual Cost
Annual	1,990 (approximate)	2	32	\$97.86	\$3,327.20

Employee Survey Common Form	maximum, depending on eligibility criteria and response rate)				
-----------------------------	---	--	--	--	--

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.