

SUPPORTING STATEMENT for PAPERWORK REDUCTION ACT SUBMISSIONS

APPLICANT BACKGROUND SURVEY

A. JUSTIFICATION

1. Circumstances that make the collection of information necessary:

Authority for the collection of **information** appears under section 717 of the Civil Rights Act of 1964, as amended, 42 USC 2000e-16, and under section 501 of the Rehabilitation Act of 1973, as amended by Public Law 99-506. The Equal Employment Opportunity Commission (EEOC) Management Directive (MD) 714 states that Federal agencies must collect and maintain applicant flow data. As part of the multi-year plans submitted to EEOC by all agencies with more than 500 employees, agencies must assess whether present recruitment sources yield qualified minority and female applicants, and applicants with disabilities. Prior to the approval of the current HHS form the only source to accomplish the collection of this information was the U.S. OPM Form 1386, Background **Survey** Questionnaire, which expired in December 1983.

The form has been revised from the previous edition to reflect the revision of Statistical Policy Directive No. 15, Race and Ethnic Standards for Federal Statistics and Administrative Reporting.

2. How, by whom, and for what purpose the information is to be used:

The form will be used by the Operating Divisions (OPDIVs), the major sub-organizations within the Department, to collect and analyze data on race, sex, national origin, and disability from applicants for employment. Information will be collected by each of the personnel offices in the Department of Health and Human Services (**HHS**). The form will be used to assess whether current recruitment efforts yield applicants who are minorities, women, and persons with disabilities. The form will be used routinely by the OPDIVs when recruiting for senior level positions and for selected job series where workforce analysis has shown evidence of an underrepresentation of minorities, women, or persons with disabilities. The results of the collection will assist an organization to determine if present recruitment sources yield qualified minority and female applicants and applicants with disabilities as required by EEOC MD 714.

Each of the eleven OPDIVs was queried as to the actual use their organization has made of the information received from the current collection. Each OPDIV makes similar use of the information and the responses have been summarized into the following statement:

The Applicant Background Survey is used to analyze data on EEO target groups, which is needed to satisfy reporting requirements mandated by the Equal Employment **Opportunity** Commission. The Survey is attached to either all or to selected vacancy announcements depending on the organization's objectives, and is used as a tool to collect voluntary information from applicants concerning race, ethnicity, and disability. Workforce analyses

are conducted using the information from the form, the results included in the organization's Affirmative Employment Plan for Minorities and Women and Affirmative Action Plan for Persons with Disabilities.

3. Use of automated, electronic, or mechanical collection techniques:

Job applicant personally fills out the Applicant Background Survey, on a voluntary basis, at the time resume/job application is sent.

4. Efforts to identify duplication:

No other form will provide HHS with the applicant information gathered by this survey.

5. Impact on small businesses or other small entities:

There will be no small businesses or other small entities involved.

6. Consequence of less frequent collection/no collection:

Collection can only be initiated when a job applicant applies for an advertised position. Privacy considerations do not permit linking the form with applicant information, so less frequent collection is not possible. If this collection of information is not conducted, the Department will be unable to identify recruitment strategies which effectively reach targeted populations as required by EEOC. Individual OPDIVs determine when and for which job series and grade levels they need to collect this information.

7. Special circumstances relating to manner of collection:

None of the listed conditions apply.

8. Consultation/comments:

For Federal Register notice information, see the Certification Notice issued from the Office of the Secretary, HHS.

Affirmative Employment Managers were contacted throughout the Department and expressed support for continuation of the collection of this information. Other government agencies currently use similar forms to collect the data requested. Copies of forms used by the U.S. Small Business Administration, the Smithsonian Institution, and the U.S. Department of State are

attached.

9. **Payment or ' to respondents:**

No payment or gift provided to respondents.

10. **Confidentiali**

The information provided will be used for statistical purposes only and will not in any way affect the respondent individually. The proposed HHS form does not require either the respondent's name or Social Security number. When the application for employment is received this form is separated from the application and does not become part of the applicant's file. The data collected from these form are used for analysis purposes only. This information is provided pursuant to Public Law 93-579 (Privacy Act of 1974) for individuals completing Federal records and forms that solicit personal information.

11. **Justification for questions of a sensitive nature**

The information to be requested includes birth year, race, national origin, sex, and indication of the presence of a disability. Submission is voluntary and is necessary to comply with EEOC Management Directive 714 requirements that agencies measure if recruitment efforts yield applicants from diverse racial and ethnic background, from males and females, and from persons with disabilities. Information will be used for statistical purposes only to determine if recruitment efforts have yielded a diversity of applicants.

12. **Estimates of hour burden of collection of information:**

We estimate approximately 310,000 respondents annually. The form will average 2 minutes to complete for a total burden of 10,33 hours. There is no cost to the respondents.

13. **Total annualized costs/respondents or record-keeper:**

There are no annual costs to respondents or record-keeper.

14. **Total annualized cost to the Federal government:**

Maximum possible hours per annum:	5,000
Cost per hour:	\$ 8.00
Total cost per annum:	\$40,000

15. **Reasons for program changes:**

No changes

16. **Publication results:**

The results are for internal use only. Each OPDIV examines the results of its own recruitment methods. No HHS-wide publication is anticipated.

17. **Removal of expiration date:**

Not seeking permission not to display expiration date.

18. **Exception to certification statement:**

No exceptions at this time.

B. COLLECTIONS OF INFORMATION EMPLOYING STATISTICAL METHODS

It is not anticipated that standard statistical method will be used to analysis the results of the collection of the data. OPDIVs will develop their own methods for analyzing the information and it is likely that they would use more simplified numerical analyses to determine if targeted populations are present in the pool of applicants.