

SUPPORTING STATEMENT A
U.S. Department of Commerce
U.S. Census Bureau
Form BC-170, U.S. Census Employment Application and
Form BC-171, Additional Applicant Information
OMB Control No. 0607-0139

Abstract

The Census Bureau currently uses the BC-170 form to collect relevant applicant information such as military service, citizenship, government employment history, language skills and availability. Administrative officials review the applicant information indicated on these forms to evaluate the eligibility and quality of an applicant for employment at the Census Bureau. In addition, the Census Bureau uses Form BC-171 as a substitute for the Equal Employment Opportunity Commission (EEOC) common use form 3046-0046, *Demographic Information on Applicants for Federal Employment*, to collect voluntary applicant data. This data is provided to the EEO office at Census for analysis and the recruitment information is used by Census to determine the effectiveness of recruitment strategies. All forms are available online or in hardcopy, depending on the type of operation, for applicants to complete and submit to the Census Bureau Office.

Justification

1. Necessity of Information Collection

This collection is authorized by Title 13, United States Code, Section 23 a and c. Collection of the information on Form BC-170, U.S. Census Employment Application, is a critical component of the hiring process for Census field staff. Recruiters, administrative staff, and hiring officials use the information provided in this form to determine eligibility, compatibility, and the quality of applicants being considered for a Census field position. Failure to collect this information could result in the hiring of unsuitable and/or unqualified workers.

While the BC-171 is a voluntary form which collects information not used to make selection decisions, it serves to allow the Census Bureau to comply with Federal directives, described in Section 11 of this document, *Justification for Sensitive Questions*, and to evaluate its recruiting sources.

The *Education and Recruiting Sources* information gathered on the BC-171 will assist the Census Bureau in determining if recruiting advertisements and tactics are working to produce qualified applicants and determine if persons at all education levels are attracted to the positions available.

2. Needs and Uses

The BC-170 collects a minimal amount of personal information that includes basic contact information, such as home address, phone number, and email. The form does require that the applicant provide their Social Security number as it is used to verify the information provided if the person is selected. Additional information requested on the form includes military service (so veteran's preference points may be awarded), age, citizenship, and selective service enrollment for all males born after December 31, 1959.

This information is used by administrative staff to determine eligibility. Other information requested includes former or current government work history, language skills, and availability. These questions are used by administrative staff to determine dual federal employment and to assist in selecting the best qualified candidate for the position as well as the applicant's availability to work the desired days and hours for that position.

As stated above, while the BC-171 is a voluntary form which collects information not used to make selection decisions, it serves to allow the Census Bureau to comply with Federal directives, described in Section 11 of this document, *Justification for Sensitive Questions*, and to evaluate its recruiting sources.

The *Education and Recruiting Sources* information gathered on the BC-171 will assist the Census Bureau in determining if recruiting advertisements and tactics are working to produce qualified applicants and determine if persons at all education levels are attracted to the positions available.

Any person interested in applying for a U.S. Census Schedule A position will be required to complete the BC-170 form and voluntarily complete the BC-171 as part of the application process. Positions using this form will be, but not limited to, field representatives, field supervisors, and clerical office staff.

Applicants interested in applying for field and clerical jobs in our Regional Offices will complete a hardcopy of these forms. Applicants interested in Special Census operations or any Decennial tests will complete PDF fillable versions, hardcopies, depending on the circumstance, or possibly an electronic version.

The information provided on Form BC-170 will be used by administrative and hiring officials to determine eligibility for employment and determining the best candidates for the position. When a person is selected, this form will be forwarded to our Human Resources department as part of the on-boarding packet needed to hire the applicant. A copy of this form will also be sent to Census Investigative Services to be used as part of the clearance process for Federal employment.

The information on this form will remain active for two years or until the person is selected or contacts Census and asks to be removed from consideration. After two years, if the person would like to still be considered for a Census field position, they would use these forms to re-apply.

These forms will not be shared or given to outside agencies.

This is an on-going collection and this version of the form has been in use since 2018. The collection requirements have not changed in that time.

Information quality is an integral part of the pre-dissemination review of the information disseminated by the Census Bureau (fully described in the Census Bureau's Information Quality Guidelines). Information quality is also integral to the information collections conducted by the Census Bureau and is incorporated into the clearance process required by the Paperwork Reduction Act.

3. Use of Information Technology

The process used by our Regional Offices, for persons interested in applying for current survey field and office positions, is a mail-out/mail-back process. Census is in the process of developing the requirements for making the application process for these positions an online process. One of the requirements would be that all operations, including Special Census and Decennial tests would use this application when fully implemented.

The process used by Special Censuses and decennial census tests would have applicants complete a fillable PDF, which would be a mail-out/mail-back process, or online version of these forms. Specific processes are to be determined.

4. Efforts to Identify Duplication.

The BC-170 and BC-171 are intended to facilitate speedy hiring and selection in situations requiring large numbers of employees for assignments of a limited duration or on a longer basis for current surveys. Accordingly, the use of the proposed two forms are limited to positions that perform work for a variety of operations – decennial census tests, special censuses, one-time surveys, or recurring surveys. This avoids undue paperwork.

5. Minimizing Burden

The collection of these forms does not impact small business or similar small entities.

6. Consequences of Less Frequent Data Collection

Not using these forms or using a form that does not provide the same or similar information, will be detrimental to the recruitment and selection process for our Schedule A staff and seriously impact Census' mission. The ability for Census to hire quality people on a large scale necessitates us to use the forms which provide the most basic information required to make quality hiring decisions while at the same time not putting an undue burden on the applicant.

7. Special Circumstances

In most situations, applicants will only be required to submit these forms one time, unless they are not selected within two years and they wish to keep their application active. There is no requirement for the applicant to provide any supporting documentation, unless requesting veteran's preference or unless the original submission is incomplete or illegible. There is no requirement for the applicant to submit multiple copies of any of these forms nor is there any need or requirement for the applicant to retain any copies of these forms. These forms will not be used in a statistical study. The data from Form BC-171 is used by the Census EEO office for their program evaluations, is used to evaluate possible barriers to equal employment opportunity and to validate the application and selection processes. The marketing information is used by Field Division to determine the effectiveness of marketing campaigns.

All person at Census who will have access to these forms are sworn to confidentiality for life and are required to take Data Stewardship training annually. Information on these forms is not shared with other agencies. Respondents are not required to submit any proprietary trade secrets or other confidential information unless it is required as part of their background investigation that is required prior to being hired.

8. Consultation Outside the Agency

The presubmission notice was published in the Federal Register on March 16, 2021, Vol. 86 FR 14405, Pages 14405-14406. During the 60-day review period, two comments were received.

1. On April 8, 2021, the Office of Legal Counsel, U.S. Equal Employment Opportunity Commission requested copies of the BC-170 and BC-171 along with supporting documentation.

On April 9, 2021, Mr. DeFrank provided that office the documents and forms requested.

2. On April 20, 2021, a follow up request from the Office of Legal Counsel, U.S. Equal Employment Opportunity Commission office requested additional information related to the elimination of certain questions on the BC-170 from original versions as well as a question related to background investigations.

On April 23, 2021, Mr. DeFrank provided responses to that office.

9. Paying Respondents

Applicants are not reimbursed or compensated for applying for Census positions nor are they provided any gifts or incentives.

10. Assurance of Confidentiality

The confidentiality of information contained on the BC-170 and BC-171 are maintained according to the provisions of the Privacy Act, 5 U.S.C., 552a. The applicants are provided a copy of the Privacy Act Statement, which appears on the first few pages of each of the forms. Completion of the forms is required by applicants in order to receive consideration for employment

11. Justification for Sensitive Questions

BC-170:

Administrative officials will review the information shown on the BC-170 form and determine the applicant's employment qualifications. Failure to collect this information could result in the hiring of unsuitable and/or unqualified employees.

BC-171:

In October 2003, the EEOC issued Management Directive (MD) 715-1, which directed and guided agencies to collect race and national origin data from applicants to evaluate possible barriers to equal employment opportunity. Subsequently, on March 3, 2010, a related joint memorandum was issued to Federal Directors of Equal Employment Opportunity and Chief Human Capital Officers from the Acting Chairman of the EEOC and the Director of the Office of Personnel Management. The joint memorandum reminded agencies of the importance of collecting applicant flow data and provided the *Demographic Information on Applicants for Federal Employment* form for agencies to use to collect these data. In addition to being in compliance with MD 715-1, use of the BC-171 form is in compliance with Executive Order 13548, which is intended to increase Federal employment of individuals with disabilities. The Census Bureau's purposes for collecting race, Hispanic origin, and disability information are:

- To determine whether its recruitment and preliminary applicant activities are effectively reaching all segments of the relevant labor pool;
- To determine whether application and selection procedures and preliminary activities allow applicants to compete on a level playing field regardless of race, national origin, sex, or disability status.

12. Estimate of Hour Burden

Respondents will complete the BC-170 and BC-171 forms only once. Most applicants will complete a hardcopy version of the forms and mail them to their respective Regional Office. We expect approximately 30,000 responses per year for current surveys, Special Censuses, and any

Decennial Census tests through 2022, 2023, and 2024. Responses will be submitted throughout this time frame.

Based on previous experience, the proposed two forms take an average of 20 minutes to complete: 15 minutes for the BC-170 and 5 minutes for the BC-171. The total hour burden over this three-year period is expected to be 30,000 hours with an annual burden of approximately 10,000 hours.

Estimated Annualized Respondent Burden Hours

Information Collection Instrument	Type of Respondent (e.g., Occupational Title)	# of Respondents (a)	Annual # of Responses/ Respondent (b)	Total # of Annual Responses (c) = (a) x (b)	Burden Hours/ Response (d)	Total Annual Burden Hours (e) = (c) x (d)
BC-170	Applicant	30,000	1	30,000	15/60	7,500
BC-171	Applicant	30,000	1	30,000	5/60	2,500
Totals		30,000	1	30,000	20/60	10,000

13. Estimate of Cost Burden

The only cost to the respondent is his/her time for completing the BC-170 and BC-171.

14. Cost to Federal Government

The estimated annual cost for printing the BC-170 and BC-171 is \$16,280. The processing of the forms at NPC is contracted annually at \$313,000. The annual estimated mailing costs of the BC-170 and BC-171 is \$70,000. This is based on an estimated cost of \$4 per mail-out/mail-back applicant packet and an estimated 12,000 applications being returned annually. The budgeted amount also allows for an additional amount for applications mailed out to respondents but not returned. The cost is budgeted for and paid for by the Census Bureau.

15. Reason for Change in Burden

With the end of Decennial operations, there will be a decrease in the number of candidates that apply for Census field positions. This is the reason for the reduction of burden hours to 30,000 hours over the next three years. This is down from the million hours from 2018 through 2020.

16. Project Schedule

The BC-170 and BC-171 will be used throughout this time frame for current survey, special censuses, and any planned decennial test operations.

17. Request to Not Display Expiration Date

As the BC-170 and BC-171 are in continuous use and will not change often, the Census Bureau requests permission to not display the expiration date on the form to avoid needless reprinting of the paper and PDF online forms.

18. Exception to the "Certification for Paperwork Reduction Act Submissions."

There are no exceptions. The agency certifies compliance with 5 CFR 1320.9 and the related provisions of 5 CFR 1320.8(b)(3).