



May 28, 2015

The Honorable Katherine Archuleta
Director
U.S. Office of Personnel Management
1900 E Street, NW
Washington, DC 20415-9700

Re: SEA proposal to make OPM Optional Form 306 (Declaration for Federal Employment)
Mandatory

Dear Director Archuleta:

As OPM seeks to assess and improve the government's recruiting and hiring processes and systems, I would like to submit a proposal for your consideration on behalf of the Senior Executives Association (SEA). SEA proposes that OPM take action to make Optional Form 306, the Declaration for Federal Employment¹, mandatory rather than optional.

Currently federal jobs may be offered and employees hired without hiring managers using or seeing the Optional Form 306. Often this Form is filled out after an initial selection is made, rather than as an initial step in the hiring process. It is also unlikely that this Form is filled out for moves that are made internally when an employee is changing agencies. Consequently, agency human resources personnel and hiring managers may not learn about issues in an applicant's background early in the hiring process, potentially resulting in either adding to hiring time and agency costs or hiring a problem employee.

During a time of tight budgets and restricted hiring at many agencies, it is imperative that agencies have every tool at their disposal to ensure only qualified and suitable candidates receive consideration for employment. It is for this reason, as well as recently publicized situations when agencies have hired individuals with problematic personnel records, that SEA proposes that OPM update agency guidance and ensure Form 306 is one of the first pieces of information an agency considers in determining suitability for federal employment, for both new hires and employees transferring between agencies.

The purpose of doing so is not to automatically discount a candidate or to replicate a security clearance, but to highlight early on in the process potential red flags early that may necessitate further due diligence by an agency before moving forward with the hiring process. Such due diligence may require asking for further information or contacting a candidate's references.

¹ https://www.opm.gov/Forms/pdf_fill/of0306.pdf

Below is a summary of our proposal, which includes suggestions to collect additional pieces of information via Form 306.

1. New hires to the government and those transferring between agencies should be required to fill out a Declaration for Federal Employment ([Optional Form 306](#)). This Form should be mandatory and not optional.
2. The Form should be provided at the time an applicant, whether internal or external, submits an application, including applicants for short-term/part-time/seasonal/intermittent and like nature positions.
3. The Form should be provided to the hiring manager as well as to the HR specialist processing the applicant. Sensitive personal information, such as Social Security numbers, should be masked.
4. The items on the Form should be modified to include the following:
 - a. In item 12 – include the following additional questions for current federal employees: Have you been placed on a Performance Improvement Plan? Have you received a formal reprimand during the previous year? Have you had any substantiated EO or IG complaints against you? If “YES,” use item 16 to provide additional information you think necessary for the reviewer of this form.
 - b. In item 13 – following the question relating to delinquency on federal debt, there should be a section 13a that inquires whether the applicant is on a payment plan approved by the IRS and then requires the additional information in item 16.

SEA believes that the benefits of making these adjustments to the Form and making its use mandatory far outweigh the detractors and encourages OPM to expeditiously consider this proposal. Doing so can effectively address concerns raised by the public and Members of Congress, e.g., that the government is hiring tax delinquents and poor performers can easily move between agencies, while ensuring HR and hiring managers have the information they need as early as possible to make the best hiring decisions for their organizations.

Thank you for your consideration. Please do not hesitate to contact me if you would like to discuss this issue in further detail, or if you’d like SEA to clarify or expound upon any of the information contained in this proposal.

Sincerely,



CAROL A. BONOSARO
President

CC: The Honorable Beth Cobert, Deputy Director for Management, Office of Management and Budget