

**Supporting Statement for the
Applications for Employment with the Board of Governors of the Federal Reserve System
(FR 28; OMB No. 7100-0181)**

Summary

The Board of Governors of the Federal Reserve System (Board), under authority delegated by the Office of Management and Budget (OMB), proposes to extend for three years, with revision, the Applications for Employment with the Board of Governors of the Federal Reserve System (FR 28; OMB No. 7100-0181). The application currently consists of the following information collections:

- Application for Employment (FR 28a), which collects information to determine the qualifications of applicants for employment with the Board (such as education and training, employment record, and other information since the time the applicant left high school),
- Applicant's Voluntary Self-Identification (FR 28s), which is an optional form that collects information on the applicant's sex, race, and ethnicity,
- Research Assistant Application (FR 28i), which collects contact information, information on a Research Assistant (RA) applicant's level of interest in various economic topics and experience in different data analytics/programs, and application documentation (including resume, cover letter, transcripts, and letter(s) of recommendation), and
- Pre-Hire Conflict of Interest Screening Form (FR 28c), which collects information from external applicants after they have been selected for an interview at the Board regarding certain financial interests that could pose a conflict of interest based on the Board's supplemental ethics regulations and/or the duties of the position for which they are applying.

The Board proposes to revise the FR 28a by removing one data field. The Board proposes to revise the FR 28s by changing one data field. The Board proposes to revise the FR 28i by adding four new data fields and removing one data field, and to revise the FR 28c by adding a new section to the form and updating the language of several of the questions for readability and to include questions about financial assets not previously contemplated due to technological changes that have occurred. Lastly, the Board proposes to revise the FR 28 clearance to include a new Reference Check Form (FR 28r).

The current estimated total annual burden for the FR 28 is 21,205 hours and would decrease to 21,143 hours. The proposed revisions would result in a decrease of 62 hours.

The FR 28a and FR 28s online forms are available through Taleo. The FR 28a PDF form is available on the Board's public website at <https://www.federalreserve.gov/careers-addinfo.htm>. The FR 28s PDF form is made available to candidates via email when applicable. The FR 28i survey is available in the Board's Research Assistant application portal at https://insights.servicenowservices.com/rar_portal. The FR 28c PDF form is sent via email when

a candidate is selected for interview. The FR 28r form will be used by Board staff to guide its reference check process.

Background and Justification

The forms that comprise the FR 28 are used to manage the Board's hiring process by collecting needed information on candidates.

The FR 28a (Application for Employment) is used to examine, rate, or assess the applicant's qualifications, and to contact the applicant to arrange an interview.

The FR 28s (Applicant's Voluntary Self-Identification) is used for equal employment opportunity (EEO) recordkeeping, reporting, and self-evaluation of hiring practices. Information collected on the FR 28s has no bearing on the determination of an applicant's job-related qualifications and completion of the self-identification form is voluntary.

The FR 28i (Research Assistant Application) is a supplement to the FR 28a and is used to collect contact information for an application for employment as an RA, including helping to match an RA candidate's interests with the different research areas at the Board and determine the applicants' data analysis and programming experience. In so doing, the FR 28i helps to streamline the RA recruitment process. In August 2024, the FR 28i (and Research Assistant application process as a whole) was transitioned to a new portal through ServiceNow. This transition also included the relabeling of certain data fields, but no new data fields were added, and no existing data fields were removed.¹

The FR 28c (Pre-Hire Conflict of Interest Screening Form) is used to ensure advance knowledge of a prospective employee's potential conflicts of interest.²

This information is not available from other sources. All data elements are requested only once. If the information on the FR 28a, FR 28i, and FR 28c is not collected from the candidate, the Board will not be able to recruit, examine, and evaluate the candidate's qualifications for employment with the Board.

Description of Information Collection

The FR 28a is completed by members of the public who would like to be considered for employment at the Board. The FR 28a comprises seven sections: (1) Background, (2) Job Preferences, (3) Education and Training, (4) Certifications and Professional Licenses, (5) Employment Record, (6) References, and (7) General Questions, including clarifying comments if applicable. The Background section collects name, address, telephone, citizenship information, the position for which the applicant is applying, and willingness to travel. The Job Preferences section asks about the type of employment desired (e.g., permanent or temporary; full or part-time; and desired compensation). The Education and Training section collects detailed

¹ This portal change did not substantively change the collection and was therefore not cleared.

² Although certain conflicts of interest information is requested on the FR 28a, the FR 28c requests additional information when an applicant is selected for an interview, in order to make sure that conflicts of interest are fully vetted before an applicant is employed at the Board while avoiding undue burden on all applicants.

information on the applicant's educational history and skills set. The Certifications and Professional Licenses section collects information on when an applicant's current certification(s) and license(s) were issued and expire. The Employment Record section collects a chronological summary of work experience. The References section collects information on three references. The General Questions section collects information such as criminal records, discharges or terminations from employment, retirement annuity status from the District of Columbia or federal governments or the military; relationships to or acquaintances with Board staff or with officers and directors of financial institutions; and the ownership interest that the applicant or their spouse or child holds in certain financial institutions.

The FR 28a application form may be completed online through the Taleo submission website, via a fillable PDF or a printed hard copy document. If the applicant completes the online version of the application through Taleo, they will initially be asked to upload a resume to Taleo. The version of the application on the Taleo website only requires the applicant to complete the initial four sections that come before section 5, the "Employment Record" section, on the PDF version of the FR 28a application. It is not until the applicant is asked to interview that they will be instructed to complete the remaining sections (5 through 7) of the application on the Taleo website prior to the interview. However, if the applicant fills out the PDF or printed document version of the FR 28a application form, they will fill out sections 1 through 7 of the PDF version in its entirety but may not be asked to supply a resume.

In addition to the information collected through the PDF application form and Taleo website for the FR 28a, applicants may be asked to provide additional information such as writing samples, assessment exercises, or other material used to evaluate the applicant's qualifications. Because such additional material is designed to test the aptitude, abilities, or knowledge of an applicant, it is not subject to the PRA and is not included in the burden for this clearance.

The FR 28s is a voluntary form completed online through the Taleo submission website that comprises three sections seeking the following information: sex of the applicant, in which applicants are asked to check the box that corresponds to their sex; ethnicity self-identification, in which applicants are asked to choose between Hispanic or Latino or Not Hispanic or Latino; and race self-identification in which applicants are asked to choose one or more among: American Indian or Alaskan Native, Asian, Black or African-American, Native Hawaiian or Other Pacific Islander, White. Applicants can choose to answer any combination of the questions or none at all.

The FR 28i is accessed through an online portal using ServiceNow and comprises four sections: Candidate Profile, Application Materials, Survey of Interest and Technical Experience, and Letters of Recommendation. The Candidate Profile collects basic contact information, legal and preferred names, education information, confirmation of U.S. citizenship, and their earliest availability to start the job if hired. The Application Materials section is where RA applicants upload a copy of their resume, a cover letter, and unofficial transcript(s). Next, the Survey of Interest and Technical Experience asks RA candidates to (1) to rate their level of interest in categories of economics and related research areas, (2) provide brief written evidence of certain qualifying characteristics indicated as important to the Board, and (3) rate their experience and

interests with various software packages and statistical programming languages. Lastly, RA applicants enter the name, email address, and an optional message to their requested recommender(s) for a letter of recommendation; letters of recommendation are completed by the requested recommender and emailed directly back to the online portal as a PDF.

The FR 28c comprises four sections and collects information from external applicants after they have been selected for an interview at the Board regarding: (1) certain financial interests held by the applicant, their spouse, or their minor child(ren); (2) immediate family members who are involved in related businesses (e.g., whether a spouse, parent, child or sibling is an employee, officer, director or trustee of any bank); (3) compensated outside employment and uncompensated positions that the applicant participates in (aside from positions with religious, social, fraternal, or political entities); and (4) a general question asking the applicant to disclose any other situations, arrangements, or investments the applicant believes could pose a conflict of interest based on the duties of the position for which they are applying. The purpose of the FR 28c form is to determine whether a conflict of interest exists that would impact the applicant's ability to fulfill the responsibilities associated with the position for which they have applied. The Board's ethics staff also uses the information collected to advise candidates of applicable divestiture requirements before candidates accept employment offers. The FR 28c is emailed to an applicant as a fillable PDF when they are selected for an interview and must be completed, signed, and returned before their interview.

The Board understands that respondents use information technology to comply with these provisions, including creating an online account through Taleo to apply to the Board and using email to submit PDFs when applicable. Applying to the Board's RA program is done through an application portal that candidates access using their login.gov credentials, which includes multi-factor authentication. Candidates without a login.gov account will have to create one in order to access the RA program's application portal. Requirements for creating a login.gov account are provided at <https://www.login.gov/create-an-account/>.

Personally Identifiable Information

Personally identifiable information (PII) obtained in this information collection includes, but is not limited to, applicant personal information, such as contact information, date of birth, race and ethnicity, and disability status; employment and education information; family relationship information; and salary and other compensation information. The information provided is sensitive in nature and is necessary to recruit, evaluate, and hire candidates for Board employment. Information collected as part of this process is stored in one or more of the following systems of records: BGFRS-1, FRB—Recruiting, Placement, and Onboarding Records (84 FR 18843); BGFRS-41, FRB—Ethics Program Records (87 FR 34271); and BGFRS-24, FRB—EEO General Files (88 FR 63106). Routine uses for which the Board may disclose the information respondents provide are described in the “Legal Status” section. The information is also covered by the following privacy impact assessments: Workday Government Cloud “WGC,” Taleo Transitions System, Taleo Recruiting System, and Research Recruiting Application.

Respondent Panel

The FR 28 panel comprises individuals seeking employment with the Board.

Frequency and Time Schedule

The FR 28 is event-generated. The FR 28a application form (both the PDF version and the online version) must be completed and submitted to the Management Division by all applicants.³ If the applicant completes the online version of the application through Taleo, they will initially be asked to upload a resume to Taleo. The version of the application on the Taleo website only requires the applicant to complete the initial four sections that come before section 5, the “Employment Record” section, on the PDF version of the FR 28a application. It is not until the applicant is asked to interview that they will be instructed to complete the remaining sections of the application on the Taleo website prior to the interview. However, if the applicant fills out the PDF version of the FR 28a application form, they will fill out sections 1 through 7 of the PDF version in its entirety but may not be asked to supply a resume. Staff in the economic research divisions and the Legal Division at the Board may distribute and collect the PDF version of the FR 28a application in their recruiting efforts. Only candidates for RA positions⁴ submit the FR 28i survey, which is completed at the same time as the FR 28a application. The FR 28s self-identification form is voluntary and, if the applicant wishes to complete this form, it is generally provided to the Board at the time the FR 28a application is submitted. Board staff who are responsible for recruiting new employees will provide and collect the FR 28c form from an applicant after the applicant has been selected for an interview, but before a formal offer of employment has been extended. Some divisions may provide the applicant with the FR 28c form after the interview has taken place but still before a formal offer of employment has been extended.

Proposed Revisions to the FR 28

The Board proposes to revise the FR 28a by removing one data field. The Board proposes to revise the FR 28s by changing one data field. The Board proposes to revise the FR 28i by adding four new data fields and removing one data field, and to revise the FR 28c by adding a new section to the form and updating the language of several of the questions for readability and to include questions about financial assets not previously contemplated due to technological changes that have occurred. Lastly, the Board proposes to implement a new Reference Check Form (FR 28r).

FR 28a

The FR 28a will remove the Pronouns field.

FR 28s

³ Additional Information about Applying for a Career at the Board is available at: <https://www.federalreserve.gov/careers-addinfo.htm>.

⁴ RA positions are most often found in the following divisions at the Board: Consumer and Community Affairs; Financial Stability; International Finance; Monetary Affairs; Research and Statistics; Reserve Bank Operations; and Supervision and Regulation.

The FR 28s will change the Gender field to Sex.

FR 28i

The FR 28i will add four new data fields to the Candidate Profile section:

- How did you learn about the RA Program?
 - Drop down list of options or type your own (i.e., family/friend, school, website)
- Have you previously completed an internship with the Federal Reserve?
 - If yes, provide location and year(s).

The FR 28i will also remove the Pronouns field.

FR 28c

The FR 28c form is being revised in the following ways:

Financial Interests Section

This section is being reformatted with specific types of holdings identified in an enumerated list to improve readability:

- ‘Thriffs’ is being changed to ‘thrift or savings and loan association.’
- A subsection ‘(3)’ is being added to collect information about candidates’ financial interests in crypto-assets and other digital assets, which have become a potential source of conflicts of interest since the FR 28c was initially cleared.
- Language is being added to clarify that assets held within certain trusts must also be reported.
- Some of the text that previously appeared in footnote 1 that offers instructions about how to identify financial sector funds has been moved into a note following the text of this section to highlight its importance.
- Contact information for the Board ethics office was added to allow candidates to ask questions about the form.
- New footnotes 2 and 3 are being added to provide definitions for ‘crypto-asset’ and ‘crypto-asset-focused investments.’

Borrowing Relationships Section

This section is being added to the FR 28c to collect information about candidates' borrowing relationships with financial institutions that several Board divisions require to determine whether candidates would be prohibited by regulation from participating in assignments involving those financial institutions. This section will also require candidates to provide information about their spouse's, minor children's, or related business organizations' borrowing relationships because those interests are treated as the candidate's for purposes of determining potential conflicts of interest.

FR 28r

As part of this clearance, the Board proposes to implement the Reference Check Form (FR 28r). This form will be completed by Board staff who are responsible for recruiting to assist them with completing two reference checks, done over the phone, for external applicants who have received a verbal offer of employment. This form will contain basic contact information for the person providing the reference and a list of 11 questions Board staff who are responsible for recruiting can ask in order to complete a reference check.⁵

Public Availability of Data

In certain circumstances, the data related to the FR 28 may be disclosed in the aggregate for statistical purposes.

Legal Status

The FR 28 are authorized by sections 10(4), 11(l), and 11(q) of the Federal Reserve Act.⁶ Section 10(4) provides that the employment, compensation, leave, and expenses of the Board's employees shall be governed solely by the provisions of chapter 3 of Title 12 the U.S. Code (dealing with the Federal Reserve System) and the regulations of the Board. Section 11(l) authorizes the Board to employ such attorneys, experts, assistants, clerks, or other employees as may be necessary to conduct its business. Section 11(q) further authorizes the Board to authorize law enforcement officers to protect and safeguard the Board's or a Reserve Bank's premises, grounds, property, and personnel, as well as operations conducted by or on behalf of the Board or a Reserve Bank. Together, these provisions give the Board broad authority to hire employees as necessary to conduct its business, which requires that the Board establish means of collecting relevant information about potential employees to determine their suitability. In addition, Executive Order 9397 (Nov. 22, 1943) directs Federal agencies to use an individual's social security number to identify individuals in agency records. The FR 28 enables the Board to carry out these employment-related functions. The collection of this information is also authorized by the Ethics in Government Act of 1978,⁷ the Ethics Reform Act of 1989,⁸ and 5 CFR 2638.104(c)(2).

⁵ The contents of the FR 28r reflect information that Board staff currently request from references on an ad-hoc basis. The adoption of the FR 28r is intended to standardize and formalize the questions that can be asked in this process. Because of the previous ad-hoc nature of these reference checks, the Board has not previously cleared the FR 28r.

⁶ 12 U.S.C. §§ 244, 248(l), 248(q).

⁷ 5 U.S.C. 13103 et. seq.

⁸ Pub. L. 101-194 (1983).

The obligation to respond to the FR 28a, FR 28c, FR 28i, and FR 28r is required to obtain the benefit of Board employment. The obligation to respond to the FR 28s is voluntary.

Certain information provided on the FR 28a, FR 28i, FR 28r, and FR 28s forms may be kept confidential under exemption 6 of the Freedom of Information Act (FOIA), which protects information in “personnel and medical files and similar files the disclosure of which would constitute a clearly unwarranted invasion of personal privacy.”⁹ For example, the release of information such as an applicant’s home address, personal phone number, and personal information regarding any references provided would likely constitute a clearly unwarranted invasion of personal privacy and would be kept confidential. However, the release of certain other collected information, such as the educational and professional qualifications of successful applicants, would not likely constitute a clearly unwarranted invasion of personal privacy and would not be treated as confidential if requested under the FOIA.

Generally, information provided on the FR 28c form may also be kept confidential from the public under exemption 6 of FOIA. In addition, financial information collected on the FR 28c form (such as confidential details about the amount of shares an applicant or his or her child or spouse owns in a bank) may be withheld under exemption 4 of FOIA, which protects from disclosure confidential commercial or financial information that is both customarily and actually treated as private by its owner and provided to the government under an assurance of privacy.¹⁰

The information collected on the FR 28a, FR 28c, FR 28i, FR 28r, and FR 28s forms will be maintained in “systems of records” within the meaning of the Privacy Act,¹¹ and a Privacy Act statement will accompany each of the five forms that respectively comprise this information collection. Disclosures of the information collected on these forms, including confidential information withheld from the public under a FOIA exemption, may be made by the Board to third parties in accordance with the Privacy Act’s “routine use” disclosure provision, which permits the disclosure of a record for a purpose that is compatible with the purpose for which the record was collected.¹² The routine uses that would permit the disclosure of the information collected on each form are listed in the specific system of records notices (“SORNs”) that apply to each form. For the FR 28a, FR 28c, FR 28i, FR 28r, and FR 28s, the information collected will be stored in the SORN entitled “BGFRS-1, FRB-Recruiting, Placement, and Onboarding Records,” located here: <https://www.federalreserve.gov/files/BGFRS-1-recruiting-and-placement-records.pdf>. The information collected on the FR 28c will be stored in the SORN titled “BGFRS-41, FRB-Ethics Program Records,” located here: <https://www.federalreserve.gov/files/BGFRS-41-FRB-Ethics-Program-Records.pdf>. If the applicant is hired, the information provided on the FR 28s may also be stored in the SORN titled “BGFRS-24: FRB—EEO General Files,” located here: <https://www.federalreserve.gov/files/BGFRS-24-eeo-general-files.pdf>.

Specifically, BGFRS-1 and BGFRS-41 provide that the information may be disclosed

⁹ 5 U.S.C. § 552(b)(6).

¹⁰ 5 U.S.C. § 552(b)(4); *Food Marketing Institute v. Argus Leader Media*, 588 U.S. 427, 440 (2019).

¹¹ 5 U.S.C. § 552a(a)(5).

¹² 5 U.S.C. § 552a(b)(3).

outside the Board in accordance with general routine uses A, B, C, D, E, F, G, H, I, and J.¹³ BGFRS-1 also provides that all or part of the record may be disclosed outside of the Board in order to disclose information to any source from which additional information is requested (to the extent necessary to identify the individual, inform the source of the purpose(s) of the request, and identify the type of information requested), when necessary to obtain information relevant to a Board decision to hire or retain an employee, issue a security clearance, conduct a security or suitability investigation of an individual, classify jobs, let a contract, or issue a license, grant or other benefit. The BGFRS-24 SORN provides that the information may be disclosed outside the Board in accordance with general routine uses A, B, C, D, E, F, G, I, and J. BGFRS-24 also provides for disclosure of information to management as a data source for production of summary descriptive statistics and analytical studies in support of the function for which the records are collected and maintained, or for related personnel management functions or manpower studies and may also be utilized to respond to investigative or legal requests for statistical information (without personal identification of individuals).

Consultation Outside the Agency

There has been no consultation outside the Federal Reserve System.

Public Comments

On July 16, 2025, the Board published an initial notice in the *Federal Register* (90 FR 32009) requesting public comment for 60 days on the extension, with revision, of the FR 28. The comment period for this notice expires on September 15, 2025.

Estimate of Respondent Burden

As shown in the table below, the estimated total annual burden for the FR 28 is 21,205 hours and would decrease to 21,143 hours with the proposed revisions. The estimated number of respondents for the FR 28a, FR 28s, and FR 28i is based on the average number of submissions of these forms over the last two years. The estimated number of respondents for the FR 28c form is based on the projected number of applicants who will be selected for an interview and required to provide the FR 28c form either before, or shortly after, their interview, based on historic averages. The estimated number of respondents for the FR 28r form is based on the total number of full-time employees¹⁴ hired in 2023 and assumes two reference checks are performed per full-time employee hired. The burden estimate was adjusted up using the standard Board burden calculation methodology. The net change in the estimated annual burden is primarily due to the removal of the pronouns field on the FR 28a. These reporting requirements represent less than one percent of the Board's total paperwork burden.

FR 28	<i>Estimated number of</i>	<i>Estimated annual</i>	<i>Estimated average hours</i>	<i>Estimated annual burden</i>
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¹³ See *General Routine Uses of Board Systems of Records*, available at <https://www.federalreserve.gov/files/SORN-page-general-routine-uses-of-board-systems-of-records.pdf>.

¹⁴ This figure does not include RAs, as their requirement for letters of recommendation is already accounted for in the FR 28i burden and they do not normally go through the FR 28r reference check process.

	<i>respondents</i>	<i>frequency</i>	<i>per response</i>	<i>hours</i>
Current				
FR 28a (Initial Application)	32,600	1	0.49	15,974
FR 28a (at Interview Selection)	1,769	1	1.51	2,671
FR 28a (PDF)	238	1	1.70	405
FR 28s	32,838	1	0.02	657
FR 28i	330	1	0.89	294
FR 28c	2,007	1	0.60	1,204
<i>Current Total</i>				21,205
Proposed				
FR 28a (Initial Application)	32,600	1	0.48	15,648
FR 28a (at Interview Selection)	1,769	1	1.51	2,671
FR 28a (PDF)	238	1	1.69	402
FR 28s	32,838	1	0.02	657
FR 28i	330	1	0.91	300
FR 28c	2,007	1	0.62	1,244
FR 28r	650	1	0.34	221
<i>Proposed Total</i>				21,143
<i>Change</i>				(62)

The estimated total annual cost to the public for the FR 28 is \$699,765. The cost to the public is estimated to decrease to \$697,719 with the proposed revisions.¹⁵

Sensitive Questions

This information collection gathers sensitive information on an applicant's sex, race and ethnicity. The Board uses this information for EEO recordkeeping and reporting and self-evaluation of hiring practices. Sections 10(4), 11(l), and 11(q) of the Federal Reserve Act¹⁶ give the Board broad authority to hire employees as necessary to conduct its business, which requires that the Board establish means of collecting relevant information about potential employees to determine their suitability.

Estimate of Cost to the Federal Reserve System

The estimated cost to the Federal Reserve System for collecting and processing the FR 28 is \$30,000.

¹⁵ The average consumer cost of \$33 is estimated using data from the Bureau of Labor Statistics (BLS), Occupational Employment and Wages, May 2024, published April 2, 2025, <https://www.bls.gov/news.release/ocwage.t01.htm#>.

¹⁶ 12 U.S.C. §§ 244, 248(q), and 248(l).