

**Wilander, Scott A**

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**From:** Smith-Toomey, Mary Beth  
**Sent:** Monday, January 29, 2007 6:48 AM  
**To:** Wilander, Scott A; Mahoney, Michael J  
**Subject:** FW: FR Doc E7-1221, Filed 1-25-07; 8:45AM (SF-15)

FYI

*Mary Beth Smith-Toomey  
OPM Forms, PRA, Records and GPEA Officer  
U.S. Office of Personnel Management  
Center for Information Services  
Plans and Policies Group  
Washington, DC 20415-7900  
Voice - 202-606-2150  
FAX - 202-418-3251*

-----Original Message-----

**From:** Bob Balick [mailto:rbalick@twcny.rr.com]  
**Sent:** Sunday, January 28, 2007 6:58 PM  
**To:** mdoboga@opm.gov  
**Cc:** sawilander@opm.gov; Smith-Toomey, Mary Beth  
**Subject:** FR Doc E7-1221, Filed 1-25-07; 8:45AM (SF-15)

Following comments are submitted IAW your invitation to do same:

- 1) The current SF-15 current edition is dated December 2004. It's OMB # 3206-0001 and has no Expiration Date.
- 2) Deletion of the SF-15 may violate 42 USC 12101 (ADA - Americans with Disabilities Act, 1990).
- 3) Other federal agencies use and need SF-15
- 4) Standard Form 171 was replaced by Optional Form 612 (current edition, December 2002) on 1 Jan 1995. OF 612, Section F, Question 2c requires attaching SF-15 with substantial supporting documentation.
- 5) The Department of Veteran's Affairs (DVA) should be specifically queried for their input to this proposed action by OPM.

Submitter's note: I am a veteran of over 20 years honorable military service in the US Air Force. I am currently rated at 40% disabled by the Dept of Veteran's Affairs. I support continuation of SF-15.

Robert M. Balick, TSgt, USAF (Ret)  
PO Box 4525  
Rome, NY  
13442-4525

8/9/2007

**Wilander, Scott A**

SF-15 Comment Period

**From:** Wilander, Scott A  
**Sent:** Friday, February 09, 2007 9:23 AM  
**To:** 'lkimble@mta.maryland.com'  
**Cc:** 'samrman@aol.com'  
**Subject:** SF-15 Recommendations (60-Day Open Period)  
**Importance:** High

Good Morning Mr Kimble,

Thank you for contacting me regarding the Standard Form (SF) 15 and updating the content. I used the notes from our phone conversation yesterday afternoon and transcribed them into the following questions, concerns, observations and suggestions.

As we discussed, I wanted to send these back to you for your review and ensure that I captured your points regarding the SF-15:

The primary purpose of our reviewing the SF-15 is to make certain the content and questions are still applicable for today's purposes. Primarily, we reviewed the form to see whether the content can be modified or improved to enable a simpler form for the veteran to complete?

Does the Federal government or individual Federal agency use the SF-15 to collect particular data that is asked for statistical or census purposes? For example, and not to be all inclusive, is anyone collecting data from the form on the number of veterans applying for jobs and or what types of preference they are using on the form?

Is there is a general clearing house to maintain SF-15's so the veteran does not have to keep filling out the form?

Many Federal dollars are put into ways to design and improve the seamless transition of returning veterans and this form is one way to simplify the Federal application process. Our observation is that all persons claiming 10-point preference must sign this SF-15 form. The principle concern we have is that in asking veterans to "repeatedly" fill out separate Standard Form 15's over and over again for each and every vacancy announcement creates a hostile environment! After awhile, we are literally forcing our disabled veterans to give up on the process as it becomes burdensome and potentially unnecessary.

If we want veterans to be applying for federal positions, we should focus on streamlining a burdensome recruitment process! Our suggestion is to streamline the completion and submission of the SF-15 similar to the Department of Veterans Affairs maintains a database on all certificates that are issued and the Department of Defense maintains databases on DD-214s and periods of service for veterans.

Our question is why doesn't OPM establish a centralized database for the Executive Branch of Government to streamline the form and make the data available to authorized users to check that the individual is entitled to the preference. The form is already on the OPM website as a fill-able form so this way a disabled veteran complete and fill out the form rather quickly. Depending on the preference claimed, he or she can submit a letter from VA, along with the supporting documentation, and especially using today's technology, this information could be put into a database system that would eliminate the need for the disabled veterans to repeatedly continue filling out the form each time he or she applies for a Federal job position?

For example, a quick retrieval system simplifies for the Federal agency the ability to go in and verify the applicant is a disabled veteran; the disabled veterans don't have to continually fill out the same form over

3/29/2007

and over again, and data analysis for statistical purposes would be centrally located in one place. This recommendation was spawned from all the Federal money being spent and concerns raised in regards to our aging veterans and newly disabled veterans returning home from the Iraq and Afghanistan conflicts and identified problems and struggles in their search for getting Federal jobs.

The benefits of this suggestion are that this data warehouse would allow a Federal agency the ability to request and verify from the centralized database system that the disabled veteran has a service-connected disability and is entitled to the preference claimed? This would reduce the repetitive and unnecessary burden on the veteran to continue to do a separate SF-15 for *each and every* job applying for in seeking employment.

## Recommendations for the Standard Form 15

### Page 1 of the Standard Form 15

- 1) Block 2 addresses four separate issues – as the form is used primarily in submitting with vacancy announcements, to delete the three areas (civil service exam, postal, exam, and position for which you currently occupy)
- 2) To protect against identity theft, use this block to put in masked SSN that is similar what credit card companies are doing in showing only the last four digits.
- 3) Block 5 should drop the Date exam was held and use it as the Date the application was submitted to the agency.
- 4) Blocks 4, 7, 8, and 9 are asking the applicant to provide almost all the same information. This for a disabled veteran may result in entering his or her SSN for all four blocks and becomes redundant and confusing. Recommend dropping the service number in Block 7; keep 8 for the SSN of the veteran as the veterans and person applying may be different (derived preference); and drop Block 9.
- 5) As we reviewed the form, we recommend that OPM be cognizant of visual impaired veterans and increase size of text. The text throughout this document is extremely small and should be enlarged to a larger font. With the reducing of redundant or unnecessary blocks of information, this space can be used to enlarge the text.
- 6) Use one-line for the title of the form (Application for 10-Point Veterans Preference) vice two-lines and this would be easier to read and save space on the form.
- 7) Recommend moving Blocks 10 and 11 under the Type of 10-Point Preference Claimed section. Replace Block 10 with Block 11 -- as many of the veterans using this form are 30% or higher and this being the first block provides a more user-friendly form for efficiency and effectiveness purposes.
- 8) Put disclaimer in the new Block 10 after “. . compensation from the VA . .” to add “at 30% or greater” - - this makes it clearer to the veterans. This recommendation from the majority of our constituents indicates that this change makes it easier to read the form by the veterans in selecting their option.
- 9) Recommendation that will enable the form to be read and easier on the eyes is to continue the dashes and arrows for Blocks 12, 13, and 14 to their respective questions on the right side of the form. This would be similar in structure to questions posed in Blocks 10 and 11.
- 10) Recommend moving the “This form must be signed by all persons claiming 10-Point preference” and place it directly under the “I certify that all of the statements made in this claim . . .” block. This signature block would then be easier to read and follow to sign as many readers will work from top to bottom and left to right in reading a document.
- 11) Recommend moving the “Preference entitlement was verified” block up to where the “This form must be signed by all persons claiming 10-Point preference” was located. Then the format will be in the same format for the applicant to read and sign in the left two blocks and agency appointing officer to verify and sign the right two blocks.
- 12) Recommend moving the “For Use by Appointing Officer only” and place this under the “Preference entitlement was verified” block. This creates a user-friendly form for the veteran to complete.
- 13) Increase font size “Signature of person claiming preference”

### Page 2 of the Standard Form 15

- 1) Is this census data or what is the purpose of collecting this data? Is this data being centrally collected somewhere and what is the purpose for collecting this data? IS this for unemployment data, how many veterans are currently employed and is this reason still valid?
- 2) Why are we asking 1 and 2 and this information is already?
- 3) Why are we asking the questions in Blocks 3 and 4: what relevance do these two questions have to getting a job? All the information on the job application will contain this information and why are we asking again makes these block redundant and unnecessary? Are the answers to these two questions being collected by anyone? If so, for what purpose?
- 4) Block 5 has relevance! Definitely can be used for identifying potential issues with reinstatement or retirement annuity of returning disabled veterans into the workforce.
- 5) Shift "Privacy Act statement" from the bottom of Page 1 to the bottom of Page 2. This puts it in the form at the end and helps the content flow smoother and easier to read for the veteran.
- 6) Blocks 6 and 7 have relevance.

**Wilander, Scott A**

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**From:** charles johnson [chjohnson71@hotmail.com]  
**Sent:** Wednesday, March 28, 2007 11:34 AM  
**To:** Wilander, Scott A  
**Cc:** chjohnson71@hotmail.com  
**Subject:** RE:SF-15

Greetings. I am writing to encourage you to maintain the SF-15 in its current form without change. I believe veterans and other eligible persons are able to complete this document without reference to any other specific guidance as the format's instructions are relatively simple and numerous veteran service organizations and people of good will are also available to provide any assistance where it is required. In addition to your stated purposes cited within the Federal Register on Jan. 26, 2007, the SF-15 may also be used as a source of reference in subsequent legal matters as having been accomplished to add support, where applicable, to the agency or veterans' position.

Thanks,  
Charles

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**Wilander, Scott A**

*Comments*

**From:** Wilander, Scott A  
**Sent:** Monday, January 29, 2007 10:43 AM  
**To:** Wilander, Scott A  
**Subject:** Comments to Address in 60 Day Notice

Address the below comments in the 60-day notice. \*

-----Original Message-----

**From:** Smith-Toomey, Mary Beth  
**Sent:** Monday, January 29, 2007 10:35 AM  
**To:** Sumberg, Jeffrey E.; Hanson, Anita R.; Thompson, Alan; Perez, Marta B; Brown, Sandra E  
**Cc:** Doboga, Mark; Mahoney, Michael J; Hanson, Anita R.; Wilander, Scott A  
**Subject:** RE: Well Done with Explanation - RE: Urgent Email re OPM Notice published 1-26-07 in Federal Register

FYI - as I mentioned to Scott this morning after we met with Anita, we need to summarize these comments in our 30 day Notice. When we get closer to issuing the 30 day Notice, we can discuss how this should be done.

Thanks again to everyone for getting this resolved so quickly this morning.

Mary Beth Smith-Toomey  
OPM Forms, PRA, Records and GPEA Officer  
U.S. Office of Personnel Management  
Center for Information Services  
Plans and Policies Group  
Washington, DC 20415-7900  
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-----Original Message-----

**From:** Sumberg, Jeffrey E.  
**Sent:** Monday, January 29, 2007 10:28 AM  
**To:** 'John P. Leonard'; Ed Lawton; Hanson, Anita R.; Thompson, Alan; Perez, Marta B; Brown, Sandra E; Steven Matthews; Robert F. Norton; Rick Wiedman (VVA); Ray Williams; Mike Plummer (NAUS); Meg Bartley; Lee M. Rivas; Larry Madison; John Fales; Joe Wynn (2); Joe Sharpe; Dick Schneider; David Greineder; Chris Slawinski; Brian Lawrence; Blake Ortner; Bill Truitt; Smith-Toomey, Mary Beth  
**Cc:** Doboga, Mark; Mahoney, Michael J; Hanson, Anita R.; Wilander, Scott A; Smith-Toomey, Mary Beth  
**Subject:** RE: Well Done with Explanation - RE: Urgent Email re OPM Notice published 1-26-07 in Federal Register

Thanks, Jack. Lesson noted!

Along the same lines, all the VSO reps should feel free to call me or Anita if you see or read something that doesn't sit right. We may be able to clear up an issue before the e-mails start flying. If OPM dropped the ball or missed something that should have gone out first to the VSOs, I'll make sure to let everyone know.

Thanks again....

-- Jeff

-----Original Message-----

**From:** John P. Leonard [mailto:jleonard@purpleheart.org]  
**Sent:** Monday, January 29, 2007 10:18 AM  
**To:** Sumberg, Jeffrey E.; Ed Lawton; Hanson, Anita R.; Thompson, Alan; Perez, Marta B; Brown, Sandra E; Steven Matthews; Robert F. Norton; Rick Wiedman (VVA); Ray Williams; Mike Plummer (NAUS); Meg Bartley; Lee M. Rivas; Larry Madison; John Fales; Joe Wynn (2); Joe Sharpe; Dick Schneider; David Greineder; Chris

Slawinski; Brian Lawrence; Blake Ortner; Bill Truitt; Smith-Toomey, Mary Beth

**Cc:** Doboga, Mark; Mahoney, Michael J; Hanson, Anita R.; Wilander, Scott A; Smith-Toomey, Mary Beth

**Subject:** Well Done with Explanation - RE: Urgent Email re OPM Notice published 1-26-07 in Federal Register

Well Done, Jeff.

Lesson Learned – A heads-up to the constituents goes a long way toward support and contains the “Rumor Mill”.

Jack Leonard

NSD

MOPH

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**From:** Sumberg, Jeffrey E. [mailto:Jeffrey.Sumberg@opm.gov]

**Sent:** Monday, January 29, 2007 10:10 AM

**To:** Ed Lawton; Hanson, Anita R.; Thompson, Alan; Perez, Marta B; Brown, Sandra E; Steven Matthews; Robert F. Norton; Rick Wiedman (VVA); Ray Williams; Mike Plummer (NAUS); Meg Bartley; Lee M. Rivas; Larry Madison; John Fales; Joe Wynn (2); Joe Sharpe; John P. Leonard; Dick Schneider; David Greineder; Chris Slawinski; Brian Lawrence; Blake Ortner; Bill Truitt; Smith-Toomey, Mary Beth

**Cc:** Doboga, Mark; Mahoney, Michael J; Hanson, Anita R.; Wilander, Scott A; Smith-Toomey, Mary Beth

**Subject:** RE: Urgent Email re OPM Notice published 1-26-07 in Federal Register

**Importance:** High

All -- This is in response to Ed Lawton's question about the OPM Federal Register Notice published on January 26, 2007 (attached at the end of Ed's e-mail below).

As you may know, Americans spend literally billions of hours each year providing information to Federal agencies by filling out forms, surveys, or questionnaires. A major aim of the Paperwork Reduction Act of 1980 (PRA), is to minimize the “burden” -- a term used in the law -- that information collection imposes on the public. Under the PRA, OMB must approve all such information collections and has broad authority over annual government-wide paperwork reduction goals established by law.

Under the PRA, every time a Federal agency seeks to collect information from ten or more members of the public, the collection must be approved by OMB. Everything from tax forms to the VA forms used to appoint a VSO as a claimant's representative is reviewed by OMB. Information collections that fall under OMB's purview include application forms, questionnaires, surveys, and reporting or recordkeeping requirements. The total “annual burden hours” and “annual burden dollars” for each and every such form are carefully tracked by OMB and monitored by Congress and watchdog agencies like GAO. I printed the list of VA forms reviewed and approved by OMB under the PRA and it runs to some 57 pages.

OMB's approval to use the SF-15 form is expiring in May 2007. As required by law, OPM is notifying the public that OMB's approval is expiring. Our intention is to seek OMB approval **so that we can continue to use the SF-15 Application for 10-Point Veterans Preference**. The PRA requires two Federal Register postings -- a 60 day notice and a 30 day notice. This is our 60 day notice.

I hope this clears up any confusion about this very routine notice required by law. While this is a routine update, we regret any confusion and will try to ensure that we provide a heads-up to the VSOs on any issues affecting veterans.

With respect to a replacement for Dan Blair as chair of the VSO quarterly meetings, that is under discussion by the Director's Office. In the meantime, Anita Hanson and I are, as always, available to answer your questions and respond to your concerns.

Thanks for your continued support.

-- Jeff

Jeffrey Sumberg

Deputy Associate Director

Office of Personnel Management

Human Capital Leadership and

Merit System Accountability Division

Phone (202)606-2786

Cell (202) 408-1882  
jeffrey.sumberg@opm.gov

-----Original Message-----

**From:** Ed Lawton [mailto:elawton@cox.net]

**Sent:** Sunday, January 28, 2007 4:15 PM

**To:** Hanson, Anita R.; Thompson, Alan; Perez, Marta B; Brown, Sandra E; Steven Matthews; Robert F. Norton; Rick Wiedman (VVA); Ray Williams; Mike Plummer (NAUS); Meg Bartley; Lee M. Rivas; Larry Madison; John Fales; Joe Wynn (2); Joe Sharpe; Sumberg, Jeffrey E.; Jack Leonard; Dick Schneider; David Greineder; Chris Slawinski; Brian Lawrence; Blake Ortner; Bill Truitt; Smith-Toomey, Mary Beth  
**Subject:** Urgent Email re OPM Notice published 1-26-07 in Federal Register

### **URGENT MESSAGE TO ALL VSO RECIPIENTS**

All,

As we are the ones who meet at OPM to discuss VSO matters including the impact of OPM policies upon American veterans and military retirees, I'm surprised we haven't heard of the below Federal Register notice that was published this past Friday. I'm very disappointed in the lack of communications by OPM to send us this notice on Friday, Jan 26th, the day this was publicized. **Is there some reason the VSOs were omitted from knowing about the publication of this notice, its' purpose and intent?**

The notice was sent to me by a veteran who spotted it in the Federal Register. Here's a quick review on how to find the notice:

**[Go to the Federal Register at <http://www.gpoaccess.gov/fr/index.html> . Near the top of the page, you'll see the following: "2007 (Volume 72) Only," and below it, the following text:**

**Browse the Table of Contents from today's issue in HTML. Click on this hyperlink and scroll down to Personnel Management Office. You'll see options to view the notice. Select either and you'll read it as listed below:**

This is another example of **the grassroots** catching something that a government agency apparently is seeking to "slide by" quietly. I didn't see anything from the larger VSOs either, the ones who publish weekly online newsletters on significant matters of importance. Apparently, even their paid staffers who are supposed to monitor and know about such things. either didn't know about this item or weren't notified either. They will soon however!

Thus, **I'm** writing to request **immediate clarification as to exactly what this means?** Is this an OPM to delete the 10-point veteran's preference application? I don't know if this is true or not, but in the absence of any dialogue from OPM, I'm transmitting their notice, below **and seeking immediate, clarification.**

**VSO Members:** If you have any input on this, please let the rest of us know your thoughts and comments. I hope the rest of you agree this is a very serious issue requiring immediate clarification.

**OPM Recipients on this Email:** I have several specific questions:

a. I (and presumably, the rest of the VSO liaison members), would appreciate your timely feedback since you (OPM employees); all probably know what this is about.

b. I would like to know if this is intended, specifically, to delete 10-point veteran preference for disabled veterans seeking federal employment? If this IS true, I think we all would like to know the background on this. Somehow, I can't believe that the primary reason for terminating this application process involving disabled veterans is that strong and healthy OPM personnel don't want to take the time reviewing these applications.

c. Regarding the use of the term "**burden**," in this OPM public notice; I'm personally "offended" that anyone in this agency would consider doing their basic duties for which they get paid, as a "burden," especially as it applies to disabled veterans. Is OPM now suggesting that if healthy OPM personnel are required to review documents submitted by severely disabled American veterans, a level of "onerous, additional effort," is forced upon OPM personnel not existing in other federal agencies? [If this is true, then I am even more troubled about what appears to be an organizational mindset towards Americans who've served the nation compared to those who've enjoyed the safety, sanctity, security and freedoms within our borders, while never serving in the armed forces or putting



themselves in jeopardy in the defense of our nation!

[Note: If OPM is merely seeking an alternative technological method of submitting this application compared to the existing process, no mention is made of this in the notice, and to my knowledge, no communications have been conveyed by OPM to this group of addressees. In other words, this is the first time, I've seen or heard anything about OPM efforts to terminate or discontinue anything related to 10-point disabled veterans.

- c. Also, why was this published on a Friday? Is that normal?
- d. Why weren't VSO Liaison Members who regularly meet w/OPM notified of this notice?
- e. Since Mr. Blair has retired, is there someone who can be included on our communications in his absence?
- f. Do we need an emergency meeting to discuss this notice? **VSO Members – your thoughts?**

Thank you.

Ed Lawton  
American Military Retirees Association

This notice appeared in the federal register:

**OFFICE OF PERSONNEL MANAGEMENT**

Proposed Collection; Comment Request for Information Collection:  
SF-15 Application for 10-Point Veteran Preference

**AGENCY:** Office of Personnel Management.

**ACTION:** Notice.

**SUMMARY:** In accordance with the Paperwork Reduction Act of 1995 (Pub. L. 104-13, May 22, 1995), this notice announces that the Office of Personnel Management (OPM) plans to submit to the Office of Management and Budget (OMB) a request for clearance of an expiring information collection, Standard Form (SF) 15, Application for 10-Point Veteran Preference. The Application for 10-Point Veteran Preference (SF 15) is used by agencies, OPM examining offices, and agency appointing officials to adjudicate individuals' claims for veterans' preference in accordance with the Veterans' Preference Act of 1944.

Approximately 11,252 forms are completed annually. Each form takes approximately 10 minutes to complete. **The annual estimated burden is 1,875 hours.**

**OPM invites comments on: whether this information is necessary for OPM to properly perform its functions; whether the information will have practical utility; whether OPM's estimate of the public burden of this collection of information is accurate and based on valid assumptions and methodology; and ways in which OPM can minimize the burden of the collection of information on those who are to respond, through the use of appropriate technological collection techniques or other forms of information technology.**

**DATES:** We will consider comments received on or before 60 calendar days from the date of this publication: January 26, 2007.

For copies of this proposal, contact **Mary Beth Smith-Toomey** on (202) 606-8358, Fax (202) 418-3251 or e-mail to [mbtoomey@opm.gov](mailto:mbtoomey@opm.gov).

Please be sure to include a mailing address with your request.

**ADDRESSES:** Send or deliver written comments to:

Mark E. Doboga, Deputy Associate Director  
Center for Talent and Capacity  
U.S. Office of Personnel Management  
1900 E. Street, NW.  
Room 6551  
Washington, DC 20415

For Administrative Coordination Contact:

**Scott A. Wilander** by  
telephone at (202) 606-0960  
by fax at (202) 606-0390; TTY at (202) 606-3134; or by e-mail at [swilander@opm.gov](mailto:swilander@opm.gov).

**Office of Personnel Management.**  
**Tricia Hollis,**  
**Chief of Staff, & Director of External Affairs**

[FR Doc. E7-1221 Filed 1-25-07; 8:45 am]

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