

UNITED STATES OFFICE OF PERSONNEL MANAGEMENT



Forms Management Guide

Office of the
Chief Information Officer (CIO)

November 2010

a New Day for Federal Service

[OCIO Directives Team and Publications Group will create the official cover sheet to match our standards once the directive is finalized]



Forms Management Guide

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Revision History

Version Number	Version Date	Revision Summary
1.0	10/20/2010	Initial release.

Executive Summary

This guide establishes policy, defines roles, assigns responsibilities, and provides specific procedures for the Office of Personnel Management (OPM) Forms Management Program.

Procedures covered include:

- Creating new forms
- Revising existing forms
- Posting forms to the Web
- Canceling obsolete forms
- Reviewing and maintaining forms

This guide is effective immediately upon issuance and is mandatory for use by all OPM organizational components.¹

The version of this document that is posted to the Web is the official, authoritative version.

¹ See Appendix B, Glossary, for the definition of organizational component.

1. INTRODUCTION

1.1 Purpose

The goal of the OPM Forms Management Program is to promote economy and efficiency by implementing cost-effective policies and procedures for designing, creating, printing, electronically generating, stocking, distributing, using, and managing forms.

The purpose of this guide is to define roles and responsibilities and establish policies and procedures for managing forms created and owned by OPM.

1.2 Scope and Applicability

This guide applies to OPM and all organizational entities within OPM (referred to collectively in this document as “OPM organizational components”).

The scope covers:

- The creation, coordination, posting, printing, control, revision, cancellation, distribution, and use of forms within OPM.
- The management of all forms owned by OPM, regardless of whether they are paper or electronic. The following types of forms are owned by OPM:
 - OPM forms: Forms owned by an OPM organizational component. They may have an internal or external audience, and they have an OPM form code.
 - Examples: OPM 71, OPM 1203FX
 - Standard forms (SF) and optional forms (OF): Forms owned by an OPM organizational component but are part of the GSA-run Standard and Optional Forms Program. More information about standard and optional forms can be found in section 3.2.1.
 - Examples: SF 182, SF 50, OF 306
 - Organizational component forms: Forms owned by an OPM organizational component that may have an internal or external audience; however, the organization that owns the form uses its own form code rather than the generic OPM code.
 - Examples: INV 40, RI 38-128, FE 6

The scope of this guide does not apply to:

- Printed items without spaces for entering information, such as instruction sheets, placards, tags, labels, and form letters.

1.3 Compliance, Enforcement, and Exceptions

Forms owned by OPM must be compliant with the OPM Forms Management Guide and Federal laws and regulations. If a form is not compliant with the Forms Management Guide, a period of 6 months will be provided for the form to be made compliant. After this period, the use of the form will not be permitted.

Program offices that have staff who are PDF and Section 508 compliance specialists are exempt from using the OPM Web Team's services to convert forms to PDF and make them 508 compliant. However, they must complete an OPM 1707, Certification Form for Electronic Forms 508 Compliancy. Furthermore, the OPM Web Team will conduct a final validation of 508 compliance.

1.4 Legal Authority

The OPM Forms Management Program is established and administered in accordance with the following Federal laws, regulations, and implementing guidance.

- 44 U.S.C. Chapters 21, 29, 31, and 33, outlines statutory requirements for managing the creation, maintenance, and use of records in Federal agencies. Included in these requirements is management of forms used by Federal agencies. The General Services Administration (GSA) has responsibility for issuing Federal regulations and conducting oversight of agency implementation of regulations regarding forms.
- 41 CFR 102-194, issued by GSA, contains policies, requirements, responsibilities, and guidelines for managing, administering, and implementing standard and optional forms management programs in Federal agencies.
- Paperwork Reduction Act (PRA) of 1980, as amended (44 U.S.C. 3501 et seq.) had as its purpose minimizing the paperwork burden on individuals, small businesses, and others resulting from collections of information by the Federal Government. The PRA instituted the concept of information resources management for all Federal information records through an integrated program encompassing all aspects of information, including the creation and use of forms, to collect data and information from the public.
- Privacy Act of 1974 (5 U.S.C. 552a, as amended) requires that forms used to collect information from individuals contain a Privacy Act statement that identifies legal authorities, whether the disclosure is voluntary or mandatory, the purposes for collecting the information, the routine uses of the information, and the effects of not providing the information. In addition, the Privacy Act prohibits an agency from denying an individual any right, benefit, or privilege provided by law for refusing to disclose her or his social security number (SSN), unless disclosure is required by Federal statute or by other laws effective prior to January 1, 1975. The agency must inform the individual whether the disclosure is mandatory or voluntary, what statutory or other authority solicits such number, and how it will be used.
- Government Paperwork Elimination Act (GPEA) of 1998 (Public Law 105-277, Title XVII, Sections 1701 et seq.) requires that Federal agencies allow individuals or entities

that deal with agencies the option to submit or transact information electronically with the agency and to maintain records electronically, when practicable.

- Section 508 of the Rehabilitation Act of 1973 (29 U.S.C. 794d, as amended) requires Federal agencies to make their electronic and information technology accessible to people with disabilities. The law applies to all Federal agencies when they develop, procure, maintain, or use electronic and information technology. Under Section 508, agencies must give disabled employees and members of the public access to information that is comparable to the access available to others.

2. RESPONSIBILITIES

2.1 Chief Information Officer (CIO)

The Chief Information Officer (CIO) is responsible for providing policy leadership and direction to OPM in managing forms in accordance with applicable Federal laws, regulations, policies, standards, and best practices.

2.2 Chief, Records Management

The Chief of the Records Management organizational unit in the Office of the CIO supervises the OPM Forms Manager.

2.3 Forms Manager

The OPM Forms Manager is responsible for:

- Publishing and maintaining the OPM Forms Management Guide.
- Establishing and maintaining an accurate inventory of all OPM current and canceled forms, in conjunction with OPM organizational components' annual forms review.
- Monitoring and overseeing the implementation of OPM forms management policies and procedures.
- Providing guidance, advice, and assistance to OPM organizational components in interpreting, applying, and implementing Federal and OPM forms management policies and procedures; determining the need for new forms or changes to existing forms; and related forms management matters.
- Serving as the OPM liaison representative to GSA for standard and optional forms, and representing OPM to the Office of Management and Budget (OMB) and other Federal Government agencies on forms management policy matters.
- Reviewing draft forms and revisions to existing forms for compliance with Federal laws and regulations and OPM policies as set out in the OPM Forms Management Guide.
- Providing an ongoing review of the OPM forms catalog for compliance with Federal laws and regulations and OPM policies as set out in the OPM Forms Management Guide, and informing owners of noncompliant forms of the specific noncompliance issues.

2.4 Heads of OPM Organizational Components

The heads of OPM organizational components are responsible for:

- Ensuring that forms created by their components comply with Federal laws and regulations and policies and procedures contained in the OPM Forms Management Guide.
- Establishing and maintaining accurate, complete records and files on their forms.
- Conducting annual reviews of their component's active forms to determine their continued need, effectiveness, possible consolidation or cancellation, and conformance with Federal and OPM policies and procedures.
- Assisting the general public with questions regarding their forms by providing accurate contact information to the public via the OPM external Web site and on their forms.

2.5 OPM Form Owners

Each form owned by OPM must have an identified OPM organizational component that acts as the chief form owner. A general test to identify ownership of a form is to determine which program, or which organizational unit, requires the form to exist. Generally, speaking, the program providing the function that requires the form owns the form. Form owners are responsible for:

- Reviewing the content of their form annually to ensure that all requested information is still required to perform the function of the form.
- Communicating form changes and requirements to the OPM Forms Manager.
- Assisting the general public with questions regarding the content of their form.
- Requesting that forms be posted on the OPM external and internal forms Web sites using the Web Team's tracking systems.
- Participating in OPM forms management cataloging efforts by providing relevant information about their forms when requested.

3. FORMS MANAGEMENT POLICIES AND PROCEDURES

3.1 General Policy for OPM Forms

OPM’s policy is that all forms owned by OPM must satisfy a valid need; must be necessary for the efficient and economical operation of the agency; must be properly designed with clear instructions; must be created, distributed, and used electronically to the maximum extent possible; and must collect social security numbers and other personally identifiable information (PII) only when necessary to satisfy a valid need. When forms no longer serve the required need, they must be either updated or canceled.

3.1.1 Forms Design Standards

All forms created by OPM must be clear, concise, and flow in a logical manner. All forms and the accompanying instructions must be written in plain language. Forms created for an audience that extends outside of OPM (called “external OPM forms”) must be designed following the GSA Standard and Optional Forms Program’s style guide found in appendix A of the Standard and Optional Forms Procedural Handbook, available on GSA.gov.

3.1.2 Personally Identifiable Information (PII)

OPM-owned forms must only collect personally identifiable information (PII) if that data is required for the operation of the program requiring the form. Please see the OPM Information Security and Privacy Policy Volumes 1 and 2 for more information.

3.1.3 Electronic Availability

All OPM-owned forms designed for use by an audience outside of the program office that created the form must be made available online through the OPM intranet, THEO in order to create a comprehensive listing. Additionally, all forms created for an audience outside of OPM may be considered, depending on suitability, for posting on OPM.gov.

3.2 Procedures for OPM Internal and External Forms

Before proceeding with creating or revising your form, please review the questions and answers in section 3.2.1 below to help you determine which externally mandated requirements your form will need to adhere to.

3.2.1 External Requirements Checklist

Question: Does your form collect information from the public, including government contractors and State and local government employees?

If yes, and the form will collect information from 10 or more individuals, your form may need to be cleared by the Office of Management and Budget (OMB) under the Paperwork Reduction Act. See OPM’s Paperwork Reduction Act (PRA) Guide for more information.

Question: Is your form a mandatory Federal Governmentwide form?

Generally, if your form is used across the Federal Government, does not allow other agencies to change the form fields, and is the only form allowable for the process, then the form is a mandatory Governmentwide form, known as a standard form. If your form is not Governmentwide and mandatory but there are at least two other agencies that need the form in an unaltered format and are willing to sign on as cosponsors, then the form may be an optional form. In either of these cases, your form needs to be cleared by the Standard and Optional Forms Management Program run by GSA. **A Federal Register notice is required when creating or changing standard and optional forms.**

- An example of a standard form is the SF 182, Authorization, Agreement and Certification of Training. This form acts the Governmentwide form for this process.
- An example of an optional form is the OF 178, Certificate of Medical Examination. This form is not a mandatory form. However, it is a form that, due to need, at least two other Federal agencies made a written commitment to use.

If your form is, or you think it will be, a standard or optional form, please read the GSA Standard and Optional Forms Procedural Handbook, linked in Appendix C, References, below.

3.2.2 Creating or Revising a Form for an Internal OPM Audience

To create or revise an internal OPM form, the prospective or current form owner must follow the steps below:

1. If you are creating a new form, review the OPM forms inventory (available at [OPM.gov/forms](https://www.opm.gov/forms)) to ensure that no existing form could fulfill the need.
2. Email formsmanager@opm.gov indicating the need for an initial review of form requirements. This notifies the OPM Forms Manager to evaluate the need for the form and identify any relevant information collection or privacy issues. The Forms Manager will assign a form number if it is a new form. The program office will be required to cite a prescribing directive, regulation, or functional need that justifies the form's creation, change, or cancellation.

 **Milestone A: Form number assigned for new form**

3. If required (as indicated by the OPM Forms Manager), create a Privacy Act Statement following the instructions in OPM's System of Records Notice (SORN) Guide. Privacy Act Statements are required when the form collects information from individuals that it will maintain in a "system of records" as defined by the Privacy Act.
4. If the form is going to be available in an electronic format, a requirements meeting will be set between the form owner, OPM Forms Manager, and the OPM Web Team.
5. Create a draft of the form. The draft can be either a PDF or Microsoft Word document.

 **Milestone B: Draft form ready for organizational component review**

6. Complete any organizational component-specific approval processes required by your program office.
7. Once you have received all required approvals, email formsmanager@opm.gov requesting final approval by the OPM Forms Manager.

 **Milestone C: Final draft form approved by OPM Forms Manager**

8. If you indicated in the email that the form is to be made available only in paper, the form is now complete. Proceed to step 10 below.
9. If the form needs to be available online proceed to step 1 of section 3.2.4, Form Posting Process, below.
10. Create or update the existing Forms Inventory Control System (FICS) entry for the new or revised form. The Forms Manager will provide access to FICS when you first contact formsmanager@opm.gov.

3.2.3 Creating or Revising a Form for an Audience External to OPM

To create or revise an OPM-owned form that serves an external audience or an OPM-owned standard or optional form, the prospective or current form owner must follow the steps below:

1. If you are creating a new form, review the OPM forms inventory (available at [OPM.gov/forms](https://opm.gov/forms)) to ensure that no existing form could fulfill the need.
2. Email formsmanager@opm.gov indicating the need for an initial review of form requirements. This notifies the OPM Forms Manager to evaluate the need for the form and identify any relevant information collection or privacy issues. The Forms Manager will identify whether the form should be designated as an SF or OF form. If it is a new OPM external form, the Forms Manager will assign a form number. If it is a new standard or optional form, the OPM Forms Manager will act as a liaison with GSA to acquire the form number. The program office will be required to cite a prescribing directive or regulation that justifies the form's creation, change, or cancellation.

 **Milestone A: Form designation identified and, if not SF or OF, form number assigned**

3. Initiate one or more of the following required processes as indicated by OPM forms management after the initial review:
 - Paperwork Reduction Act clearance process.
 - Contact the OPM Paperwork Reduction Act Officer to begin the process.
 - This process will include 90 days of comment period in addition to processing time.
 - See OPM's Paperwork Reduction Act (PRA) Guide.
 - Privacy Act Statement writing process.

- Contact the OPM Privacy Officer to begin the process.
 - See instructions for writing a Privacy Act Statement in OPM’s System of Records Notice (SORN) Guide.
- Standard or Optional Form GSA approval process (SF 152, available at GSA.gov).
- The OPM Forms Manager will act as a liaison with GSA for this process.
 - See GSA Standard and Optional Forms Procedural Handbook.
4. If the form is going to be available in an electronic format, a requirements meeting will be set between the form owner, OPM Forms Manager, and the OPM Web Team.
 5. Create a draft of the form. The draft can be either a PDF or Microsoft Word document.
 - 📄 **Milestone B: Draft form ready for organizational component review**
 6. Complete any organizational component-specific approval processes required by your program office.
 7. Once you have received all required approvals, email formsmanager@opm.gov requesting final approval by the OPM Forms Manager.
 - 📄 **Milestone C: Final draft form approved by OPM Forms Manager**
 8. Complete the additional compliance processes as required:
 - Paperwork Reduction Act clearance process.
 - Standard and Optional Form approval process.
 - 📄 **Milestone D: Form approved by required external organizations for use**
 9. If you indicated in the email that the form is to be made available only in paper, the form is now complete. Proceed to step 11 below.
 10. If the form needs to be available online, proceed to step 1 of section 3.2.4, Form Posting Process, below.
 11. Create or update the existing Forms Inventory Control System (FICS) entry for the new or revised form. The Forms Manager will provide access to FICS when you first contact formsmanager@opm.gov.

3.2.4 Form Posting Process

Once a draft form is approved to move forward for posting, the form owner must follow the steps below to have the form made 508 compliant, receive final approval, and be posted:

1. If the form needs to be available online, you must complete the Section 508 compliance process. Go to <http://theo.opm.gov/References/publishing/web/trackingsystems/index.asp> and submit the approved final draft form to the OPM Web Team for conversion to PDF and 508 compliance. In the “Project Requirements” prompt, indicate that the form needs to be developed into a 508-compliant, fillable form and that the file must be returned by e-mail. Select “N/A” in the “Files will be posted to” prompt. As previously stated, however, program offices that have staff who are PDF and Section 508 compliance specialists are exempt from using the OPM Web Team’s services to convert forms to PDF and make them 508 compliant. They must complete an OPM 1707, Certification Form for Electronic Forms 508 Compliancy, when submitting the form for step 2 below.

 **Final Milestone: 508-compliant PDF form ready for web posting (OPM.gov and, or THEO)**

2. Email the 508-compliant PDF form to formsmanager@opm.gov and request final posting approval.
3. Once you receive final posting approval from the Forms Manager, go to <http://theo.opm.gov/References/publishing/web/trackingsystems/index.asp> and submit a Web Task ticket to the OPM Web Team for the posting.
4. Create or update the existing Forms Inventory Control System (FICS) entry for the new or revised form. The Forms Manager will provide access to FICS when you first contact formsmanager@opm.gov.

3.2.5 Canceling a Form

To cancel (make obsolete) an OPM-owned form, the form owner must:

1. Ensure that no other program or organizational component is using the form.
2. Email formsmanager@opm.gov indicating that the form is to be canceled.
3. For SFs and OFs, complete an SF 152 and provide the required information, as outlined in the Standard and Optional Forms Procedural Handbook, to OPM forms management.

3.2.6 Annual Forms Review

Organizational components must annually review all the forms they own in the Forms Inventory Control System (FICS) to ensure that:

1. All information collected is required to operate the associated program.
2. All forms with questions no longer required by the system are updated to remove the fields that are not required.
3. All forms are entered in the FICS and each entry contains accurate information about the form.

APPENDIX A: ACRONYMS

Acronym	Expansion
FICS	Forms Inventory Control System
GSA	General Services Administration
OF	optional form
OPM	Office of Personnel Management
PII	personally identifiable information
SF	standard form

APPENDIX B: GLOSSARY

external form: A form created for an audience that extends outside of OPM. This includes standard and optional forms.

form: A fixed or sequential order of data elements, designed for gathering, organizing, and transmitting prescribed information quickly and efficiently. A form is considered a record and must be managed in accordance with 41 CFR 102-193 and 102-194.

form designation: The alphabetic preface to the form number. It identifies which agency created the form. For example, the form designation “OPM” indicates the form is created by the U.S. Office of Personnel Management.

form owner: The individual within the program office assigned responsibility for maintaining the form. Forms are owned by programs, and a general test to identify ownership of a form is which program, or which organizational unit, requires the form to exist. Users completing forms as participants in a program do not apply as needing the form to exist. The program providing the function that requires the form owns the form.

format: A guide, table, sample, or exhibit that illustrates a predetermined arrangement or layout for presenting data. Most formats are largely narrative in nature and the space needed by the respondents to furnish the desired information varies substantially. Formats are often used where the arrangement and layout of items are simple and flexible and where the number of respondents is comparatively limited.

internal form: A form created for use only within OPM.

obsolete form: A form no longer in use.

OPM organizational component: The first level of organizational division within OPM, e.g., Human Resources Solutions or Retirement and Benefits.

optional form (OF): A form developed by a Federal agency for use in two or more Federal agencies, approved by GSA for nonmandatory Governmentwide use, and assigned an Optional Form number. This definition applies to both paper and electronic forms.

personally identifiable information (PII): Information that:

1. Can be used to discern or trace a person's identity; and
2. Alone, or combined with other information, can be used to compromise the integrity of records relating to a person, by permitting unauthorized access to or unauthorized disclosure of these records.

standard form (SF): A fixed or sequential order of data elements, prescribed by a Federal agency through regulation, approved by GSA for mandatory use, and assigned a Standard Form number. This definition applies to both paper and electronic forms.

APPENDIX C: REFERENCES

C.1 Authorities

The following provide legal authority for this directive:

- 44 U.S.C. Chapters 21, 29, 31, and 33, <http://www.archives.gov/about/laws/#fedag>
- Government Paperwork Elimination Act (Pub. L. 105-277, Title XVII), <http://www.archives.gov/records-mgmt/policy/electronic-signature-technology.html>
- Paperwork Reduction Act (44 U.S.C. 3501), <http://www.archives.gov/federal-register/laws/paperwork-reduction/>
- Privacy Act of 1974 (5 U.S.C. 552a), <http://www.justice.gov/opcl/privstat.htm>
- Standard and Optional Forms Management Program (41 CFR 102-193, 41 CFR 102-194), http://ecfr.gpoaccess.gov/cgi/t/text/text-idx?c=ecfr&tpl=/ecfrbrowse/Title41/41cfr102-193_main_02.tpl and <http://ecfr.gpoaccess.gov/cgi/t/text/text-idx?c=ecfr&sid=d4e9598c706dd7f103ea98535b2b87c0&rgn=div5&view=text&node=41:3.1.1.7.48&idno=41>
- Section 508 of the Rehabilitation Act of 1973 (29 U.S.C. 794d, as amended), http://frwebgate.access.gpo.gov/cgi-bin/getdoc.cgi?dbname=browse_usc&docid=Cite:+29USC794d

C.2 External and Internal Issuances Incorporated by Reference

C.2.1 External References

- GSA Standard and Optional Forms Procedural Handbook [http://contacts.gsa.gov/webforms.nsf/0/36C81E8708E51B22862575EF00443D1A/\\$file/Handbook09.pdf](http://contacts.gsa.gov/webforms.nsf/0/36C81E8708E51B22862575EF00443D1A/$file/Handbook09.pdf)

C.2.2 OPM Internal References

- Paperwork Reduction Act (PRA) Guide
[only available to those with intranet access]
- System of Records Notice (SORN) Guide
- Information Security and Privacy Policy
[only available to those with intranet access]
 - Volume 1 http://theo.opm.gov/policies/ispp/isp_policy1.pdf
 - Volume 2 http://theo.opm.gov/policies/ispp/isp_policy2.pdf

C.2.3 Forms

- OPM 1707, Certification Form for Electronic Forms 508 Compliancy
[only available to those with intranet access]
- SF 152, Request for Clearance or Cancellation of a Standard or Optional Form
[http://contacts.gsa.gov/webforms.nsf/0/BE53143214270EB985256A3E00658874/\\$file/sf%20152.pdf](http://contacts.gsa.gov/webforms.nsf/0/BE53143214270EB985256A3E00658874/$file/sf%20152.pdf)



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