

**Supporting Statement for Paperwork Reduction Act Statement Submissions
“United States Park Police Personal History Statement Questionnaire”
OMB Control Number 1024-0245**

Terms of Clearance: None

A. Justification

- 1. Explain the circumstances that make the collection of information necessary. Identify any legal or administrative requirements that necessitate the collection. Attach a copy of the appropriate section of each statute and regulation mandating or authorizing the collection of information.**

The authority to collect information on the attached form is derived from one or more of the following: Title 5, Code of Federal Regulations, section 5.2; Title 5, United States Code, sections 1302, 1304, and 3301; sections 8(b), 8(c), and 9(c) of Executive Order 10450; and Title 42, United States Code, section 2455.

The United States Park Police Personal History Statement Questionnaire (USPP Form 1) collects detailed information that will be used principally as a basis for an investigation to determine suitable applicants for the position of a United States Park Police Officer. Suitability determination means fitness or eligibility for employment and refers to identifiable character traits and past conduct which are sufficient to determine whether a given individual is likely to be able to carry out the duties of a Federal job with appropriate efficiency and effectiveness, and loyalty to the United States. We looked at forms used by other agencies with OMB approval. However, there was no form that asked the detailed questions that are needed to hire a United States Park Police Officer. This pool of applicants, if hired, will attend the Federal Law Enforcement Training Center in Glynco, Georgia. Without this questionnaire, we would not be able to adequately screen out the unsuitable applicants and ensure the selection of the best possible police recruits for the critical sensitive position of a United States Park Police Officer.

- 2. Indicate how, by whom, and for what purpose the information is to be used. Except for a new collection, indicate the actual use the agency has made of the information received from the current collection. [Be specific. If this collection is a form or a questionnaire, every question needs to be justified.]**

The United States Park Police Personal History Statement Questionnaire will be used by all applicants seeking employment to the position of a United States Park Police Officer. The information supplied by the applicants will be used by applicant investigators to determine their suitability as a police officer. Applicant investigators will verify the information provided by the applicants. If an applicant is hired the questionnaire will become part of employees security file. If

an applicant is not hired, the questionnaire is kept secured and later destroyed in accordance with the Office of Personnel Management's disposal of documents.

3. Describe whether, and to what extent, the collection of information involves the use of automated, electronic, mechanical, or other technological collection techniques or other forms of information technology, e.g., permitting electronic submission of responses, and the basis for the decision for adopting this means of collections. Also describe any consideration of using information technology to reduce burden [and specifically how this collection meets GPEA requirements.]

Not applicable. The completion of the United States Park Police Personal History Statement Questionnaire does not use electronic or automated technologies in the collection of this information. For security and ethical reasons, we prefer that this form is completed by hand and brought to us and reviewed in person.

4. Describe efforts to identify duplication. Show specifically why any similar information already available cannot be used or modified for use for the purposes described in item 2 above.

The United States Park Police Personal History Statement Questionnaire is a unique form in the Federal government. There is no other form that asks the detailed questions that are necessary to adequately screen candidates for the critical sensitive position of a United States Park Police Officer.

5. If the collection of information impacts small businesses or other small entities (Item 5 of OMB Form 83-1), describe any methods used to minimize burden.

This collection does not pose a burden for small entities.

6. Describe the consequences to Federal program or policy activities if the collection is not conducted or is conducted less frequently, as well as any technical or legal obstacles to reducing burden.

If the collection were not performed annually, the United States Park Police would not be able to hire adequately screened applicants for the position of a United States Park Police Officer. This would adversely affect the protections and preservations of the Monuments and Memorials as well as the protection of visitors, and our ability to detect and deter crime.

7. Explain any special circumstances that would cause an information collection to be conducted in a manner:

- **Requiring respondents to report information to the agency more often than quarterly;**
- **Requiring respondents to prepare a written response to a collection of information in fewer than 30 days after receipt of it;**

- **Requiring respondents to submit more than an original and two copies of any document;**
- **Requiring respondents to retain records, other than health, medical, government contract, grant-in-aid, or tax records for more than three years;**
- **In connection with a statistical survey, that is not designated to produce valid and reliable results that can be generalized to the universe of study;**
- **Requiring the use of statistical data classification that has not been reviewed and approved by OMB;**
- **That includes a pledge of confidentiality that is not supported by authority established in statute or regulation, that is not supported by disclosure and data security policies that are consistent with the pledge, or which unnecessarily impedes sharing of data with other agencies for compatible confidential use; or**
- **Requiring respondents to submit proprietary trade secrets or other confidential information unless the agency can demonstrate that it has instituted procedures to protect the information's confidentiality to the extent permitted by law.**

There are no special circumstances that require the collection to be conducted in a manner inconsistent with the guidelines in 5 CFR 1320.

8. If applicable, provide a copy and identify the date and page number of publication in the Federal Register of the agency's notice, required by 5 CFR 1320.8(d), soliciting comments on the information collection prior to submission to OMB. Summarized public comments received in response to that notice [and in response to the PRA statement associated with the collection over the past three years] and describe actions taken by the agency in response to these comments. Specifically address comments received on the cost and hour burden.

Describe efforts to consult with persons outside the agency to obtain their views on the availability of data, frequency of collection, the clarity of instructions and recordkeeping, disclosure, or reporting format (if any), and on the data elements to be recorded, disclosed or reported. [Please list the names, titles, addresses and phone numbers of persons contacted.]

Consultation with representatives of those from whom information is to be obtained to those who must compile records should occur once every three years -2- even if the collection of information activity is the same as in prior periods. There may be circumstances that may preclude consultation in a specific situation. These circumstances should be explained.

The NPS published a 60-Day Federal Register Notice to solicit public comments on April 16, 2007 (Volume 72, pages 19019-19020). No public comments were received.

Over the past 3 years, the United States Park Police has contacted several applicants to get feedback on how long it took them to complete the United States Park Police Personal History Statement Questionnaire (USPP Form 1). They are as follows:

Mr. James Alexander
149 Baltimore Avenue
Massapequa, New York 11758
(516) 644-9451

Mr. Alexander stated it was easy for him to obtain the information he needed to provide in the Personal History Statement Questionnaire because he's applied previously with other law enforcement agencies and kept those papers on file. Mr. Alexander also felt that the information being asked in the Personal History Statement Questionnaire wasn't invasive at all. He stated it was exactly what he expected and he probably would have asked the same questions if he was in the same position. He also felt the questions being asked were very easy to understand, and didn't feel that his privacy was being violated. However, Mr. Alexander stated it took him about 2 hours to fill out the Personal History Statement Questionnaire because he wanted to make sure he filled out everything accurately.

Mr. Justin Alexander
5263 Shamrock Avenue, N.W.
N. Canton, Ohio 44720
(330) 705-6318

Mr. Alexander stated that all the information he needed to provide for his Personal History Statement Questionnaire was fairly easy to fill out because he's lived in one location for most of his life. He also stated that he didn't feel any of the information to be invasive because it was relevant to his job. He also thought the questions were clear to understand and never felt his privacy was being violated. However, he stated that it took him about 4 to 5 hours to complete the Personal History Statement Questionnaire because he wanted to take his time to fill out all the information that was required.

Mr. Robert Jones
784 Clocks Blvd.
Massapequa, New York
(516) 509-7568

Mr. Jones stated that it was easy for him to obtain the information he needed for his Personal History Statement Questionnaire because he's applied with other law enforcement agencies before, so he's used to filling out the material. He didn't feel in any way that the questions were invasive, but that he was able to clearly understand what was being asked of him. However, he stated it took him about a week and a half to fill out his Personal History Statement Questionnaire because he had to obtain a copy of his Driver's License Record and College Transcripts, which took him awhile to receive that information.

Mr. Antonio Boone
6204 Gemini Ct.
Burke, Virginia 22015
(619) 921-5317

Mr. Boone felt that all the information he needed for his Personal History Statement Questionnaire was easy to obtain because he's applied to other law enforcement agencies. He didn't feel in any way that the questions were invasive. He felt that he was able to clearly understand everything that was being asked of him in the Personal History Statement Questionnaire. Mr. Boone didn't feel in any way that his privacy was being violated. However, he stated it took him about a week to complete the Personal History Statement Questionnaire because he wanted to take his time.

9. Explain any decision to provide any payment or gift to respondents, other than remuneration of contractors or grantees.

Not applicable.

10. Describe any assurance of confidentiality provided to respondents and the basis for the assurance in statute, regulation or agency policy.

All copies are stored in secure areas and considered confidential information. Only individuals with a need to use the information have access to it. The files are stored in locked file cabinets in locked rooms. The information collection complies with the Privacy Act of 1974 and OMB Circular A-130. Such information may be exempt from disclosure under the FOIA (5 U.S.C. 552).

11. Provide additional justification for any questions of a sensitive nature, such as sexual behavior and attitudes, religious beliefs, and other matters that are commonly considered private. This justification should include the reasons why the agency considers the questions necessary, the specific uses to be made of the information, the explanation to be given to the persons from whom the information is requested, and any steps to be taken to obtain their consent.

Although very personal questions are necessarily asked, because of the purpose of the information collection, private questions such as the above are not asked.

12. Provide estimates of the hour burden of the collection of information. The statement should:

- **Indicate the number of respondents, frequency of response, annual hour burden, and an explanation of how the burden was estimated. Unless directed to do so, agencies should not conduct special surveys to obtain information on which to base hour burden estimates. Consultation with a sample (fewer than 10) of potential respondents is desirable. If the hour burden on respondents is expected to vary widely because of differences in activity, size or complexity,**

show the range of expected hour burden and explain the reasons for the variance. Generally, estimates should not include burden hours for customary and usual business practices.

- **If this request for approval covers more than one form, provide separate hour burdens for each form and aggregate the hour burdens in Item 13 of OMB Form 83-1**
- **Provide estimates of annualized cost to respondents for the hour burdens for collections of information, identifying and using appropriate wage rate categories. The cost of contracting out or paying outside parties for information collection activities should not be included here. Instead, this cost should be included in Item 14.**

Normally, 600 applicants apply annually for the position of a United States Park Police Officer. Based on the feedback from the contacted applicants, it is estimated that it takes an average of 8 hours to prepare the Personal History Statement Questionnaire (USPP Form 1). Therefore, the preparation burden is 4,800 hours.

$$600 \times 8 = 4,800 \text{ annual burden hours} \times \$19/\text{hour} = \$91,200.$$

- 13. Provide an estimate of the total annual [non-hour] cost burden to respondents or record-keepers resulting from the collection of information. (Do not include the cost of any hour burden shown in Items 12 and 14).**
- **The cost estimates should be split into two components: (a) a total capital and start-up cost component (annualized over its expected useful life) and (b) a total operation and maintenance and purchase of services component. The estimates should take into account costs associated with generating, maintaining and disclosing or providing the information [including filing fees paid]. Include descriptions of methods used to estimate major cost factors including system and technology acquisition, expected useful life of capital equipment, the discount rate(s), and the time period over which the costs will be incurred. Capital and start-up costs include, among other items, preparations for collecting information such as purchasing computers and software, monitoring, sampling, drilling and testing equipment; and record storage facilities.**
 - **If the cost estimates are expected to vary widely, agencies should present ranges of cost burdens and explain the reasons for the variance. The cost of purchasing or contracting out information collection services should be a part of this cost burden estimate. In developing cost burdens estimates, agencies may consult with a sample of respondents (fewer than 10), utilize the 60-day pre- OMB submission public comment process and use existing economic or regulatory impact analysis associated with the rulemaking containing the information collection, as appropriate.**

- **Generally, estimates should not include the purchases of equipment or services, or portions thereof, made (1) prior to October 1, 1995, (2) to achieve regulatory compliance with requirements not associated with the information collection, (3) for reasons other than to provide information or keep records for the government or (4) as part of customary and usual business practices.**

There are no non-hour costs.

14. Provide estimates of annualized cost to the Federal government. Also, provide a description of the method used to estimate cost, which should include quantification of hours, operational expenses (such as equipment, overhead, printing and support staff), and any other expense that would not have been incurred without this collection of information. Agencies also may aggregate cost estimates from Items 12, 13, or 14 in a single table.

The estimate of annual cost to the Federal Government is \$1,200.00 for printing of forms yearly. The annual hourly cost to the Federal Government to review the forms is estimated at \$108,000. This is based on the following:

Applicants 600 x 6 Hours = 3,600 Hours x \$30/Hour = \$108,000

Therefore, the total annual cost to the Federal Government is \$109,200.

15. Explain the reasons for any program changes or adjustments reported in Item 13 of 14 of the OMB Form 83-1.

There are no program changes or adjustments.

16. For collections of information whose results will be published, outline plans for tabulation and publication. Address any complex analytical techniques that will be used. Provide the time schedule for the entire project, including beginning and ending dates of the collection of information, completion of the report, publication dates, and other actions.

Not applicable.

17. If seeking approval to not display the expiration date of OMB approval of the information collection, explain the reasons that the display would be inappropriate.

Not applicable.

18. Explain each exception to the certification statement identified in Item 19 "Certification for Paperwork Reduction Act Submissions," of OMB Form 83-1.

Not applicable.