

**SUPPORTING STATEMENT
NAVAL SEA SYSTEMS COMMAND AND FIELD ACTIVITY
VISITOR ACCESS REQUEST**

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.

RESPONSE: CNO ltr 5320 Ser 09N2/24532651 dtd 1 Nov 02 indicates the use of JPAS through out DOD. JPAS requires social security number usage. Excerpt from the above mentioned CNO ltr regarding JPAS requirement:

1. As directed by reference (a), the Joint Personnel Adjudication System (JPAS), a web-based system developed for use by security personnel throughout the Department of Defense, is being deployed throughout the Department of the Navy (DON). Security personnel will use the Joint Clearance Access Verification System (JCAVS) portion of JPAS to manage the command's access authorization process, to validate personnel security clearance eligibility and to determine the status of personnel security investigation requests. Commands with JCAVS access may use the JCAVS data in lieu of the Defense Clearance and Investigations Index (DCII) data and the DON Central Adjudication Facility (CAF) clearance certification records, as appropriate, to support local access determinations.

2. The timing for employing JCAVS within the DON is critical due to the forthcoming changes in communication systems, including elimination of AUTODIN messages. Effective 1 January 2003, all DON CAF clearance determinations will be communicated using JPAS/JCAVS. Further, commands will also use JCAVS to request DON CAF action, to forward visit requests, and to validate and/or complete non-disclosure agreements.

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.

RESPONSE: Authorized entry to a NAVSEA building is granted to visitors to conduct official business with specific representatives of Naval Sea Systems Command or Field Activity. Using JPAS, the NAVSEA Security Office will verify a visitor's identify information entered on the form - Full Name (Last, First, Middle Initial), Social Security Number, Citizenship, Agency/Company name, and telephone number. The form will also be used to capture the reason of the visit and the names of individuals being visited.

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 collection. Also describe any consideration of using information technology to reduce burden.

RESPONSE: NAVSEA Security confirms the information entered on the form with a photo identification card and JPAS. Because of this three-part identification process requires a photo identification card to be compared to the visitor requesting access, no electronic submission of the data is possible. To minimize the time spent in the Visitor Office, the form will be made available electronically to be filled and printed at the visitor's convenience. The printed form will be required to be presented in the Visitor Office when a request is made.

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.

RESPONSE: Only NAVSEA badges will work for the card readers. Other accepted badges such as NDW and NAVSEA Field Activity badges have to be shown to the guard.

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

RESPONSE: There is no impact on small business or other small entities.

6. Describe the consequence 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.

RESPONSE: The capture of this data is required for all visitors requiring access to NAVSEA buildings. Without an ability to verify visitor identification through this form, a photo identification card, and JPAS, NAVSEA buildings will no longer grant access to visitors.

7. Explain any special circumstances that require the collection to be conducted in a manner:

a. Requiring respondents to report information to the agency more often than quarterly;

RESPONSE: The information will be required for each visitor access request. Any request can be valid for one week. For each additional request, a new form must be submitted.

b. Requiring respondents to prepare a written response to a collection of information in fewer than 30 days after receipt of it;

RESPONSE: All responses are required to gain access to a NAVSEA building. Responses can be prepared in advance of any requested access. However, each visit request requires a printed copy of the form.

c. Requiring respondents to submit more than an original and two copies of any document;

RESPONSE: Only one original is required for any Visitor Access Request.

d. Requiring respondents to retain records, other than health, medical, government contract, grant-in-aid, or tax records, for more than three years;

RESPONSE: Respondents are not required to retain copies of any Visitor Access Request.

e. In connection with a statistical survey, that is not designed to produce valid and reliable results that can be generalized to the universe of study;

RESPONSE: Data collected on the Visitor Access Request form would not be part of a statistical survey.

f. Requiring the use of a statistical data classification that has not been reviewed and approved by OMB;

RESPONSE: Data collected on the Visitor Access Request form will not be used with any statistical data classification.

g. 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;

RESPONSE: Privacy Act: P.L. 93-579

h. 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.

RESPONSE: Data collected on the Visitor Access Request is unrelated to proprietary trade secrets. The confidential information collected (Name, Social Security Information, and country of citizenship) will be protected. Privacy Act P.L. 93-579.

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 5CFR 1320.8(d), soliciting comments on the information collection prior to submission to OMB. Summarize public comments received in response to that notice and describe actions taken by the agency in response to these comments. Specifically address comments received on 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. Consultation with representatives of those from whom information is to be obtained or those who must compile records should occur at least once every 3 years - even if the collection of information activity is the same as in prior periods. There may be circumstances that mitigate against consultation in a specific situation. These circumstances should be explained.

RESPONSE: The 60-day notice published June 1, 2007 (72 FR 30566).
No comments were received.

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

RESPONSE: Individuals presenting the Visitor Access Request form to the NAVSEA Security office will receive no payment or gift for their response.

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

RESPONSE: 53-979 Privacy Act. Also, all nine digits of the SSN# are required for JPAS data base. DOD absolutely refuses to modify the program due to budget constraints. The forms are filed in a secured cabinet which is in a room that is locked up at night and a security guard is stationed right outside the door.

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. The

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 persons from whom the information is requested, and any steps to be taken to obtain their consent.

RESPONSE: The Visitor Access Request does not ask questions of a sensitive nature, such as sexual behavior and attitudes, religious beliefs, and other matters that are commonly considered private.

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

a. 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 estimated hour burden and explain the reasons for the variance. Generally, estimates should not include burden hours for customary and usual business practices.

RESPONSE: $5200 \times .25 = 1300$ hrs

Number of Respondents:	5,200
Frequency of Response:	each visit
Annual Hour Burden:	.25 hours per response

Each visit request should take no longer than .25 hours. This time estimate includes the time to fill the Visitor Access request and the time required to wait for a security officer to process request.

b. If the request for approval covers more than one form, provide separate hour burden estimates for each form and aggregate the hour burdens in Item 13 of OMB Form 83-I.

RESPONSE: The Visitor Access Request is the only form required to be submitted.

c. 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 13.

RESPONSE:

Annual Hour Burden:	.25 hours
Average Wage/Rate per hour:	\$35.00

Burden per Visit:	\$8.75
Annual number of Respondents:	5,200
Burden per Visit:	\$8.75
Total Annual Burden (all visitors)	\$45,500

13. Provide an estimate of the total annual cost burden to respondents or recordkeepers resulting from the collection of information. (Do not include the cost of any hour burden shown in items 12 and 14.)

a. The cost estimate 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 component. The estimates should take into account costs associated with generating, maintaining, and disclosing or providing the information. 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 costs will be incurred. Capital and startUp 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.

b. If 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 burden 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.

c. Generally, estimates should not include 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 or private practices.

RESPONSE: There will be no additional cost burden for filling the Visitor Access Request.

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 expenses that would not have been incurred without this collection of information. Agencies may also aggregate cost estimates from paragraphs 12, 13, and 14 in a single table.

RESPONSE: \$45,500 (5200 x \$8.75)

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

RESPONSE: New collection.

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 report, publication dates, and other actions.

RESPONSE: The data collected on the form will not be published.

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

RESPONSE: The OMB expiration date will appear on the form.

18. Explain each exception to the certification statement identified in Item 10, "Certification for Paperwork Reduction Act Submissions," of OMB Form 83-I.

RESPONSE: There will be no exceptions to the certification statement identified in Item 10 of OMB Form 83-I.

B. Collection of Information Employing Statistical Methods.

RESPONSE: The collecting of this information does not employ statistical methods.