

Supporting Statement
Personal Identity Verification (PIV) Request, NA Form 6006
(OMB Control No. 3095-0057)

1. **Circumstances Making the Collection of Information Necessary.** The Personal Identity Verification (PIV) Request, NA Form 6006, is completed by all individuals requiring recurring access to non-public areas of NARA's facilities and IT network (such as NARA employees, contractors, volunteers, NARA-related foundation employees, volunteers, interns, and other non-NARA Federal employees, such as Federal agency reviewers) herein referred to as "applicants," in order to obtain a NARA Federal Identity Card (FIC). After approval of the request, the applicant is given an FIC, which provides access to the non-public areas of NARA's facilities and IT network.

The collection of information is necessary to comply with Homeland Security Presidential Directive (HSPD) 12 requirements for secure and reliable forms of personal identification issued by Federal agencies to their employees, contractors, and other individuals requiring recurring access to non-public areas of Government facilities and services. This form was developed to comply with this requirement. Its use is authorized by 44 U.S.C. 2104.

In November 2007, NARA submitted a Change Worksheet to OMB requesting the following changes to the form.

- 1) The term "Identification Card" replaced Federal Identity Card (FIC) and Personal Identity Verification (PIV) throughout the form.
- 2) The Privacy Act Statement was modified to include access to NARA IT systems.
- 3) Section B certification was amended to provide reference to two other actions that must be certified on the form by the identity processor.

2. **Purpose and Use of the Information.** NARA security staff use the information to verify the personal identity of the applicant and authorize issuance of the FIC. At the National Archives at College Park and the National Archives Building in Washington, D.C., some of the information is entered into the access control system database associated with the buildings' proximity card reader systems.
3. **Use of Information Technology and Burden Reduction.** The form is filled out by hand and must be signed and presented to NASS staff to obtain an FIC and proximity card. Because of the low number of respondents annually, it is not cost effective for NARA to make this information collection GPEA compliant. Automation is applied to the issuance of the actual FIC/proximity card in the Washington, DC area.
4. **Efforts to Identify Duplication and Use of Similar Information.** HSPD-12 mandates 5-year renewals of the FIC. Each renewal may include information that is found in an earlier application. While we have no process at present that can permit automatic use of the earlier information, it is likely that the systems being developed

for Government-wide use in the PIV process will support minimizing duplicate information in the future through automatic population of certain fields on the form. When the FIC is renewed, however, the individual must sign the new form.

5. **Impact on Small Business or Other Small Entities.** The collection of information does not have a significant impact on small businesses.
6. **Consequences of Collecting the Information Less Frequently.** If the information collection were not conducted, applicants would either be refused admission to non-public areas of NARA's facilities and IT network or could only be admitted to the facilities with visitor passes. Applicants admitted as visitors would need to be continually escorted in non-public areas by NARA employees or the security force. This alternative would be an impractical and very inefficient use of staff time and could also be a security risk. To avoid an adverse impact, NARA needs to collect the information when the FIC is first issued, when verifying security clearances, when there is a substantial change in personal information or security clearance of the FIC holder, and when reissuing the FIC. Most FIC's are issued for five years. Contractor FIC's are issued for five years or until the end of the contract. Agency reviewer FIC's are issued for the duration of their assignment with NARA, not to exceed five years. Before the FIC is reissued, a new form is filled out and the information is verified.
7. **Special Circumstances Relating to the Guidelines of 5 CFR 1320.5.** The information collection is not conducted in a manner inconsistent with the guidelines in 5 CFR 1320.5.
8. **Comments in Response to the Federal Register Notice and Efforts to Consult Outside Agency.** No consultation has been made with persons covered by the information collection. A *Federal Register* Notice was published on December 28, 2006 (71 FR 78225 and 78226) inviting the public to comment. No comments were received.
9. **Explanation of Any Payment or Gift to Respondents.** No payment or gift is provided to respondents for this information.
10. **Assurance of Confidentiality Provided to Respondents.** There is assurance of confidentiality provided to respondents as required by the Privacy Act of 1974. The application form contains a Privacy Act statement describing the authority, uses, and possible disclosures that may be made of the personal information.
11. **Justification for Sensitive Questions.** No questions of a sensitive nature are asked. However, the following information of a personal nature is asked: date of birth, height, weight, hair color, and eye color. This information is needed to ensure that the person receiving the FIC is accurately described for security control purposes. In addition, some applicants may present a Social Security Card as one of the two forms

of personal identification required to process the request, in accordance with OMB's guidance and implementation of HSPD-12.

- 12. Estimates of Hour Burden Including Annualized Hourly Costs.** There are approximately 1,500 respondents per year, with a total annual burden of 75 hours. The frequency is annual. It takes 3 minutes for applicants to complete their portion of the form (items A6 through A7 and E36 through E37). The burden was determined by observing individuals complete the form.

The annualized hourly cost to each respondent is slightly over \$0.90 (.05 hour @ \$18.09 per hour times 3 minutes). This estimate is based on the average of \$18.09 per hour in July 2004 for private industry and State and local government workers in the United States, as reported by the Bureau of Labor Statistics, *National Compensation Survey: Occupational Wages in the United States, July 2004* (<http://www.bls.gov/ncs/ocs/sp/ncbl0727.pdf>)

- 13. Estimate of Other Total Annual Cost Burden to Respondents or Recordkeepers.** There are no costs to respondents other than their time to complete the form. Respondents are not required to keep records solely to support their response.

- 14. Annualized Cost to the Federal Government.** We estimate that the annual cost to the Government for this information collection is \$15,600. These costs include computer paper for printing the application form, entering data for the access control system, operating the system in the Washington, DC area, and issuing the form, FIC, and proximity card.

- 15. Explanation for Program Changes or Adjustments.** There is an increase in burden due to the addition of volunteers, interns, and foundation employees to the existing categories of members of the public requiring recurring access to non-public areas of NARA facilities and IT services (i.e., contractors and agency reviewers).

- 16. Plans for Tabulation and Publication and Project Time Schedule.** This information will not be published and is used only for internal program purposes.

- 17. Reason(s) Display of OMB Expiration Date is Inappropriate.** The expiration date for OMB approval of this information collection will be displayed on the form.

- 18. Exceptions to Certification for Paperwork Reduction Act Submissions.** There are no exception to the certification statement identified in Item 19 of OMB Form 83-I.