

**OMB Supporting Statement**  
(SF 85, SF 85P, SF 85PS, SF 86, SF 86A, SF 86C)

Investigative Requests for:

- Questionnaire for Non-Sensitive and Low Risk Positions (SF 85)
- Questionnaire for Public Trust Positions (SF 85P)
- Supplemental Questionnaire for Selected Positions (SF 85PS)
- Questionnaire for National Security Positions (SF 86)
- Continuation Sheet for Questionnaires (SF 86A)
- Standard Form 86 Certification (SF 86C)

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.**

Depending upon the purpose of the investigation, the United States Government is authorized to ask for this information under Executive Orders (E.O.) 9397, 10450, 10865, 12333, 12968, and 13467; sections 3301, 3302, and 9101 of title 5, United States Code; sections 2165 and 2201 of title 42, United States Code; chapter 23 of title 50, United States Code; and parts 2, 5, 731, 732, and 736 of title 5, Code of Federal Regulations.

**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.**

The information collected on the SF 85, SF 85P, SF 85PS, SF 86, SF 86A, and SF 86C is needed for investigating and determining suitability for Government employment, contractor employee fitness, eligibility for access to classified information, and access to federally controlled facilities and information systems.

The content and format of the information collected is the basis for a large scale automated investigations processing system. The U. S. Office of Personnel Management (OPM), Federal Investigative Services Division (FISD) uses the Personnel Investigations Processing System (PIPS), to schedule the investigations from the data collected by the forms.

The **SF 85** collects information needed to initiate a suitability investigation. The investigation is scheduled by FISD or other agencies from the data provided on the SF 85. Checks consist of federal records repositories, local law enforcement, and institutions relevant to the personal history of the subject of investigation, such as educational institutions and employers. The information obtained is used in combination with information on the SF 85 itself in determining suitability for Federal employment or

contractual service or access to federally controlled facilities and information systems. If the information from the respondent is not collected by the SF 85, the required investigation cannot be conducted. Background investigations are required for all employees in the Federal Executive Branch and persons with access to federally controlled facilities and information systems.

The **SF 85P** is used to collect information needed to initiate a suitability investigation for a public trust position. The investigation is scheduled by FISC from the data entered on the SF 85P – and formerly the SF 85PS. It is proposed that the SF 85PS be eliminated because the questions formerly on the SF85PS now reside on the SF 85P. Checks consist of federal records repositories, local law enforcement, and institutions relevant to the personal history of the subject of investigation, such as educational institutions, employers, and credit bureaus. The results of the investigation, in combination with information on the SF 85P, are used in determining suitability for Federal employment or contractual service. If the information from the respondent is not collected by the SF 85P, a background investigation cannot be conducted. Background investigations are required for all employees in the Federal Executive Branch.

The **SF 86** collects information needed to initiate a background investigation for persons under consideration for or retention in a national security position. Checks consist of federal records repositories, local law enforcement, and institutions relevant to the personal history of the subject of investigation, such as educational institutions, employers, and credit bureaus. The results of the investigation, in combination with data on the SF 86, are used in determining placement in a position involving national security duties or access to classified information. If the information from persons subject to investigation is not collected on the SF 86, the required background investigation cannot be conducted. Unless the background investigation is conducted, a person cannot be granted access to classified information or placed in a national security position.

The **SF 86A** was previously used in lieu of blank paper as a continuation of the form with which its use was associated and not for any unique purpose exclusive from the associated form. This form was used with the SF 85, SF 85P, and the SF 86. It is proposed that this form be eliminated as it is not necessary when e-QIP is used. Additionally, GSA has requested that the Standard Forms be available to customers per website only. They will no longer be stocking the paper forms. The **SF 86C** is used in lieu of completing a new SF 86 to allow the individual to indicate that there have been no changes in the data provided on the most recently filed SF 86 or to allow the individual to easily provide new or changed information. The electronic format of the proposed SF 86 eliminates the need for a separate SF 86C.

**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.**

The SF 85, SF 85P, and SF 86 are standard forms used for collecting subject data to be used in official background investigations conducted by the U.S. Government. e-QIP (Electronic Questionnaires for Investigations Processing) is a web-based system application that currently houses electronic versions of the SF 85, SF 85P, and SF 86. This internet data collection tool provides faster processing time and immediate data validation to ensure accuracy of the respondent's personal information.

e-QIP automates the data collection process from the respondent, applies all required data editing rules to the respondent-supplied information, enforces data integrity, and provides sponsoring agencies an automated capability to review and approve each respondent's submission before releasing the data to an investigative services provider (ISP). e-QIP serves as a feeder system to other governmental systems, including ISPs and sponsoring agency personnel or security systems such as that at the State Department.

A respondent's complete and certified investigative data will remain secured in the e-QIP system until the next time the respondent is sponsored by an agency to complete a new investigative form. Upon initiation, the respondent's previously entered data (except 'yes/no' questions) will populate a new investigative request and the respondent will be allowed to update their information and certify the data. In this instance, time to complete the form is reduced significantly.

The numerous benefits offered by e-QIP to Federal agency customers have resulted in its rapid adoption across the government. Currently there are over 60 different Federal agencies, including every major cabinet department, servicing a worldwide government community of respondents and other federal systems. At any given time there are approximately 200,000 active investigative requests in e-QIP. In Fiscal Year 2008, nearly one million cases were successfully scheduled for investigation. The built-in flexibility of e-QIP allows its data collection capabilities to be utilized by other ISPs for various portions of their investigative workload. Additionally, the e-Government initiative also mandates that agencies utilize e-QIP for all investigations and reinvestigations.

The planned collection for the SF 85, SF 85P, and SF 86 is an electronic application that introduces additional functionality to e-QIP. The electronic application is a dynamic, interactive, web-based tool that guides users in providing biographic details, declarations, clarifications, and mitigating information necessary to conduct investigations for the hiring and clearing process.

The electronic application includes branching questions and instructions which provide for a tailored collection from the respondent based on varying factors in the respondent's personal history. The burden on the respondent is reduced when the respondent's personal history is not relevant to a particular question, since the question branches, or expands for additional details, only for those persons who have pertinent information to provide regarding that line of questioning. As such, the burden on the respondent will vary depending on whether the information collection relates to the respondent's personal history. The electronic application permits on-demand instruction, quality controls, the

use of automated decision rules and cross-referencing with external databases. The electronic application enhances self-reporting of relevant information and reduces overall investigation processing times by increasing accuracy of data provided.

**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 information collected on these forms is individual specific and not available from other sources, thus minimizing duplication.

**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.**

Not applicable. This collection of information does not affect small businesses 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 to reducing burden.**

The **SF 85** is used to initiate an initial background investigation required by E.O. 10450 for determination of suitability for employment, and must be completed for that investigation. If the information is not collected, agencies cannot comply with E.O. 10450 or 5 USC 3301 and 3302. This collection cannot be made less frequently. The SF85 is also used to initiate the minimum background investigation for persons with access to federally controlled facilities and information systems that require credentialing determinations. If the information is not collected, agencies cannot comply with Homeland Security Presidential Directive (HSPD) 12. This collection cannot be made less frequently.

The **SF 85P** is used to begin initial and update background investigations required by E.O. 10450 for determination of suitability for employment in a public trust position, and must be completed for that investigation. If the information is not collected, agencies cannot comply with E.O. 10450 or 5 USC 3301 and 3302. This collection cannot be made less frequently.

The **SF 86** is used to initiate background investigations required by E.O. 10450 and 12968. All positions involving access to classified national security information are subject to this level of investigation. If this information is not collected, agencies cannot comply with E.O. 10450, 10865, 12333, and 12968. This collection of information cannot be made less frequently.

**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 designed to produce valid and reliable results that can be generalized to the universe of study;
- \* requiring the use of a 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.

Not applicable.

**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. 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 may preclude consultation in a specific situation. These circumstances should be explained.**

The 60-day Federal Register Notice was published June 23, 2008 (Volume 73, Number 121, pages 35421-35422). In addition to coordination throughout OPM, the following agencies made comments during the public comment period: Social Security Administration, Joint Security and Suitability Reform Team, Department of Housing and Urban Development, Department of Health and Human Services, U.S. Agency for International Development, Department of Homeland Security, Central Intelligence Agency, Department of Transportation, Office of the Director of National Intelligence, Department of State, Department of State Mental Health Services, Federal Bureau of Investigation, Defense Personnel Security Research Center, and Department of Energy.

Due to the extensive nature of the comments, they have been consolidated in a matrix and provided as a supplemental attachment to this package. This matrix includes the commenter, relevant form and question number, the comment, rationale for comment, response, and rationale for response.

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

Not applicable. Individuals voluntarily complete these forms to receive the benefit of Federal employment.

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

The SF 85, SF 85P, and SF 86 include a Privacy Act Information statement. The statement indicates that the forms are in full compliance with 5 U.S.C. 552a (the Privacy Act of 1974) and other laws protecting the rights of the respondent. Further, the forms note that the information provided by the respondent, including the identity of the respondent, may be disclosed to the respondent upon request.

A person completing the forms is granted partial confidentiality under 5 U.S.C. 552a and 5 CFR 736. The forms contain an *Authorization for Release of Information and Fair Credit Reporting Disclosure and Authorization*, signed by the person completing the form and, if applicable, *the Authorization for Release of Medical Information Pursuant to the Health Insurance Portability and Accountability Act (HIPAA)*. The authorization forms request that record custodians and sources of information contacted during the investigation provide requested data concerning the person being investigated. Individuals completing the forms are informed that information obtained from record custodians and other sources is for “official use by the Federal Government” and can be disclosed only as authorized by law. Data reported on these forms is not released to the public under the Freedom of Information Act.

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

The SF 85 is an investigative tool. The form is used to obtain data from individuals with which to initiate an investigation to meet the suitability adjudicative requirements in 5 CFR 731. The questions represent an effort to obtain as much relevant and required information as possible directly from the person being investigated, following the provisions of the Privacy Act. It is used for non-sensitive positions, or for persons who require credentialing determinations for access to federally controlled facilities and

information systems that do not require a higher level of investigation, and its content is limited accordingly.

Information requested on the SF 85 about current illegal drug activity and alcohol abuse is used to meet the above requirements in determining suitability for employment. The instructions on the SF 85 inform the respondent of the reason the information is requested, the authority for requesting it, how it will be used, and to whom it may be disclosed. They describe the investigative process and inform the respondent that OPM or the Federal agency requesting the investigation will make the final determination.

Questions on the **SF 85** that may be considered sensitive in nature are listed and explained below:

- Section 17 (Police Record): This information was previously collected on the Optional Form 306, Declaration for Federal Employment, per Title 5. The information is also necessary to make accurate and complete checks of investigative files.

- Section 18 (Illegal Use of Drugs or Drug Activity): This information was previously collected on the Optional Form 306, Declaration for Federal Employment, per Title 5. This information is relevant as an individual's abuse of drugs may put people, property, or information systems at risk and drug involvement can raise questions about an individual's reliability and trustworthiness and ability or willingness to comply with laws, rules, and regulations, thus indicating that his or her employment would not promote the efficiency of the service or protect its integrity.

- Section 19 (Use of Alcohol): This information is relevant as an individual's abuse of alcohol may put people, property, or information systems at risk and an individual's abuse of alcohol may impact on his or her ability to complete the duties of the job and/or raise questions about his or her reliability and trustworthiness, thus indicating that his or her employment would not promote the efficiency of the service or protect its integrity.

- Section 21 (Financial Record): This information was previously collected on the Optional Form 306, Declaration for Federal Employment, per Title 5. Inquiry into personal finances is limited to Federal debt. It provides information used to determine trustworthiness, reliability, and honesty, and is especially relevant for positions entailing fiduciary responsibilities.

The **SF 85P** is an investigative tool. The form is designed to collect information appropriate for determining suitability for public trust positions. The form obtains data from individuals with which to initiate an investigation to meet the adjudicative requirements established in 5 CFR 731. The questions represent an effort to obtain as much relevant and required information as possible directly from the person to be investigated in accordance with provisions of the Privacy Act

Questions on the **SF 85P** that may be considered sensitive in nature are listed and explained below:

- Section 18 (Relatives): Inquiries about relatives are limited to immediate family. This information may be necessary to make accurate and complete checks of the FBI and other investigative files.

- Section 19 and 20 (Foreign Contacts; Foreign Financial Interests; Foreign Business, Professional Activities, and Foreign Government Contacts; and Foreign Countries You Have Visited): Inquiries into foreign contact and activities, to include foreign travel, are necessary to develop information about activities to serve as the basis for scheduling required investigations. This is authorized by E.O. 10450.

- Section 21 (Mental and Emotional Health): Inquiry into certain medical information is limited to certain types of consultations. For certain positions, respondents will be required to complete this more extensive, supplemental questionnaire.

- Section 22 (Police Record): Inquiry into certain convictions or arrests in the last seven years may be appropriate for positions involving a high degree of public trust and for sensitive positions not requiring access to classified national security information. This information is also necessary to make accurate and complete checks of investigative files.

- Section 23 (Illegal Use of Drugs or Drug Activity): Inquiry into illegal drug use is required by E.O. 10450.

- Section 24 (Use of Alcohol): Inquiries into use of alcohol is required by E.O. 10450.

- Section 26 (Financial Record): This information was previously collected on the Optional Form 306, Declaration for Federal Employment, per Title 5. Inquiry into personal finances provides information used to determine trustworthiness, reliability, and honesty, and is especially relevant for positions entailing fiduciary responsibilities.

The instructions on the SF 85P inform the respondent of the reason that the information is requested, the authority for requesting it, how it will be used, and to whom it may be disclosed. They describe the investigative process and inform the respondent that OPM or the Federal agency requesting the investigation will make the final determination.

The questions on the **SF 86** represent an effort to obtain from the respondent as much relevant and required information as possible to make a security determination.

Questions on the SF 86 that may be considered sensitive in nature are listed and explained below:

- Section 18 (Relatives): Inquiry into relatives and associates includes immediate and extended family members and other associates. This information is necessary to make accurate and complete checks of the FBI and other investigative files.



- Section 19 (Foreign Contacts) and Section 20 (Foreign Activities): Inquiries into foreign contact and activities, to include foreign travel, are necessary to develop information about activities to serve as the basis for scheduling required investigations. This is authorized by the implementation of E.O. 12968, specifically the Adjudicative Guidelines.
- Section 21 (Mental and Emotional Health): Inquiry into certain medical information is limited to certain types of consultations. E.O. 12968 requires inquiry into relevant medical information that may affect one's ability to safeguard classified information.
- Section 22 (Police Record): Inquiries into certain convictions or arrests are required by E.O. 12968. The information is also necessary to make accurate and complete checks of investigative files.
- Section 23 (Illegal Use of Drugs and Drug Activity): Inquiries into illegal drug use is required by E.O. 12968.
- Section 24 (Use of Alcohol): Inquiries into use of alcohol is required by E.O. 12968.
- Section 26 (Financial Record): Inquiries into personal finances and financial delinquencies are used to determine trustworthiness, reliability, and honesty. This information is required by E.O. 12968.
- Section 29 (Association Record): Inquiries into the respondent's association record is required as the answers may reflect on loyalty to the U.S., as outlined in E.O. 12968.

The instructions on the SF 86 inform the respondent of the reason that the information is requested, the authority for requesting it, how it will be used, and to whom it may be disclosed. They describe the investigative process and inform the respondent that OPM or the Federal agency requesting the investigation will make the final determination.

**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 estimated 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 burden estimates for each form and aggregate the hour burdens in Item 13 of OMB Form 83-I.**

**\* 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.**

The SF 85, SF 85P, SF 85PS, SF 86, SF 86A, and SF 86C are completed by both employees of the Federal Government and individuals not employed with the Federal Government, to include Federal and military contractors. Federal employees are defined as those individuals who are employed as civilian or military personnel with the Federal Government. Non-Federal employees include members of the general public and all individuals employed as Federal and military contractors or individuals otherwise not directly employed by the Federal Government. The estimated burden hours vary by form, as described below. There is no cost to respondents.

The burden estimates were derived from a study completed by a contractor. The sample applicants included a mixture of male and female participants of varying ages and ethnicities, including participants with prior military experience.

The project team targeted 27 individuals for participation in the study, each of whom was randomly assigned to complete and provide time burden information for one of three sets of forms: (1) SF 86, (2) SF 85 and SF 85PS, and (3) SF85P and SF 85PS. The final sample therefore consisted of nine participants in each category. The total sample included 15 males and 12 females. Males ranged from 22 to 72 years old, and females ranged from 24 to 39 years old. Fourteen males were White, and one was of Hispanic or Latino ethnicity. All females in this sample were White. Eight participants had previous military experience, three in the SF 86 sample, three in the SF 85P sample, and two in the SF 85 sample.

Participants were given (1) the form(s) they were assigned to complete, and (2) instructions for completing the form(s). Participants were provided with a description of the general purpose of the study and their role in it. They were instructed that their role in the project was to provide estimates of the time it took (1) to read and fill out the form(s) they had been given, and (2) gather the information required to fill out their form(s). They were asked to track these time estimates carefully for each form they filled out, and to fill out the Time Burden sheet for their form when they were done.

It is estimated that 47,700 non-Federal individuals will complete the SF 85 annually. Each form takes approximately 100 minutes to complete. The estimated annual public burden is 79,500 hours.

It is estimated that 98,700 non-Federal individuals will complete the SF 85P annually. Each form takes approximately 150 minutes to complete. The estimated annual burden is 246,750 hours.

Burden estimates for the SF 85PS are not included as it is proposed that this form be eliminated.

It is estimated that 21,800 non-Federal individuals will complete the SF 86 annually. Each form takes approximately 150 minutes to complete. The estimated annual burden is 54,500 hours.

Burden estimates for the SF 86A are not included as it is proposed that this form be eliminated.

Burden estimates for the SF 86C are not included as it is proposed that this form be eliminated.

The number of forms completed varies depending on the number of investigations requested/completed each year. Estimates are provided below:

	<u>Number of Non-Federal Respondents</u>	<u>Burden Hours</u>
SF 85	47,700	79,500
SF 85P	98,700	246,750
SF 86	<u>21,800</u>	<u>54,500</u>
	168,200	380,750

It is estimated that the total number of non-Federal respondents for the SF 85, SF 85P, and SF 86 is 168,200 annually. Accordingly, the estimated annual burden is 380,750 hours.

A variable in assessing burden hours is the nature of the electronic application. The electronic application includes branching questions and instructions which provide for a tailored collection from the respondent based on varying factors in the respondent's personal history. The burden on the respondent is reduced when the respondent's personal history is not relevant to a particular question, since the question branches, or expands for additional details, only for those persons who have pertinent information to provide regarding that line of questioning. As such, the burden on the respondent will vary depending on whether the information collection relates to the respondent's personal history.

Additionally, once entered, a respondent's complete and certified investigative data remains secured in the e-QIP system until the next time the respondent is sponsored by an agency to complete a new investigative form. Upon initiation, the respondent's previously entered data (except 'yes/no' questions) will populate a new investigative request and the respondent will be allowed to update their information and certify the data. In this instance, time to complete the form is reduced significantly.

**13. Provide an estimate for 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).**

**\* 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 and purchase of services 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 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 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 collections 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.**

**\* 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.**

There is no cost to individual respondents.

**14. Provide estimates of annualized costs 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 may also aggregate cost estimates from Items 12, 13, and 14 in a single table.**

Previous cost estimates were based on the demand for each individual form and the current printing cost per hundred, as supplied by GSA. GSA will no longer provide printed forms and it is intended that the forms be available to customers per web-based system only.

e-QIP is an established web-based system which will house the revised SF 85, SF 85P, and SF 86. Since e-QIP is used to collect this information from both federal and non-federal respondents, there is no additional cost associated with revisions to these collections based solely on non-federal respondents.

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

The overall annual public burden hours for the SF 85, SF 85P, and SF 86 have increased from 366,200 to 380,750 hours to reflect an adjustment of the annual burden hours from previous hours cited. As a result of reforms to investigative processes, the SF 85, SF 85P, and SF 86 were expanded to collect from the respondent more accurate and relevant information that is of investigative and adjudicative significance earlier in the investigative process, thus increasing the length of the collections.

**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.**

Not applicable. Information collected on the forms 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.**

OPM requests an exception to the 5 CFR 1320 requirements that the expiration date be displayed on the forms because of the large volume of all forms currently in print and circulation. It is not cost effective to destroy and reprint forms only to change the expiration date.

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

Not applicable.