Supporting Statement for Paperwork Reduction Act Submission
OMB Control Number 3090-00XX
Temporary Contractor Information Worksheet

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.**

Information collected through the Temporary Contractor Information Worksheet is necessary to meet:

- The Office of Management and Budget (OMB) Guidance M-05-24 for Homeland Security Presidential Directive (HSPD) 12 which authorizes Federal departments and agencies to ensure that temporary contractors have limited/controlled access to facilities and information systems, and
- GSA Directive CIO P 2181.1 Homeland Security Presidential Directive-12 Personal Identity Verification and Credentialing which states that GSA temporary contractors must undergo a minimum of a FBI National Criminal Information Check (NCIC) to receive unescorted physical access.

GSA requires the collection of the information in the Temporary Contractor Information Worksheet to authorize and initiate background check requests for GSA temporary contractors. The background checks are carried out by the US Department of Homeland Security, Immigration and Customs Enforcement, Federal Protective Service (DHS/ICE/FPS) Contractor Suitability and Adjudication Division in accordance with the terms and conditions of separate Memoranda of Agreement (MOAs) with GSA and with GSA Public Building Service (PBS).

The Office of Management and Budget (OMB) Guidance M-05-24 for Homeland Security Presidential Directive (HSPD) 12 authorizes Federal departments and agencies to ensure that temporary contractors have limited/controlled access to facilities and information system. According to GSA policy as documented in GSA Directive CIO P 2181.1 Homeland Security Presidential Directive-12 Personal Identity Verification and Credentialing, GSA temporary contractors must undergo a minimum of a FBI National Criminal Information Check (NCIC) to receive unescorted physical access.

According to GSA policy contractors (as described above) must submit two (2) sets of fingerprints on Form FD-258.

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 GSA requesting official, referred to as “Sponsor,” collects and forwards the Temporary Contractor Information Worksheet and all necessary supporting documentation securely by email, fax, or overnight express mail in a sealed envelope to

DHS/ICE/FPS to perform the required background checks for GSA contractors on those contracts the requesting official is responsible for. Often the GSA requesting official is the Contracting Officer's Technical Representative (COTR) or Contracting Officer's Representative (COR) for the contract, but this role may be fulfilled by a project manager, Public Buildings Service (PBS) building manager, or local HSPD-12 Point of Contact (POC) as appropriate.

If the contractor has a prior background check, DHS/ICE/FPS uses the information in Temporary Contractor Information Worksheet to verify the prior determination. When DHS/ICE/FPS makes an access determination, it uses the contact information in the Temporary Contractor Information Worksheet to notify the GSA sponsor, the GSA HSPD-12 Program Management Office (PMO), and temporary contractor's vendor company point of contact.

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.**

Currently the only way to collect information is by having the applicant complete the form using black or blue ink or by typing the data in the form and then printing it. GSA is working to pursue an automated way to send the information required in the form from the GSA Credential and Identity Management System (GCIMS) to DHS/ICE/FPS in the future.

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 provided on the Temporary Contractor Information Worksheet related to an individual contractor is needed to identify the individual and contact them as part of the background check processing by DHS/ICE/FPS. The Temporary Contractor Information Worksheet has some common data fields with Form FD-258 used to capture fingerprints for the Department of Justice Federal Bureau of Investigation (FBI) needed in order to conduct a FBI National Crime Information Check (NCIC), also known as the fingerprint check, but the common data is needed to identify the individual since the two forms are often sent separately to DHS/ICE/FPS. In addition, the Temporary Contractor Information Worksheet requires information that is not collected on the FD 258 and that is required to tie temporary contractors to GSA contracts, buildings, and identify vendor's POC information, and notify applicants concerning authority to collect information, background check process, Privacy Act routine uses, and final determination.

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

The collection of information does not pose a significant burden on 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.**

Collection of this information is necessary for GSA contractors to be granted access and work in GSA controlled facilities. Without the specific information on the Temporary Contractor Information Worksheet, DHS/ICE/FPS would not be able to identify and contact the individual, and conduct the appropriate background check, thus affecting GSA's ability to hire temporary contractors to meet the economic stimulus objectives of the American Recovery and Reinvestment Act of 2009 and GSA's overall security posture. Any alteration of the information to be collected on the Temporary Contractor Information Worksheet must be consistent with the terms of agreement in the current Memoranda of Agreement (MOAs) between GSA and DHS/ICE/FPS.

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;**
- **Prepare a written response to a collection of information in fewer than 30 days after receipt of it;**
- **Submit more than an original and 2 copies of any document;**
- **Retain records, other than health, medical, government contracts, grant-in-aid, or tax records, for more than 3 years;**
- **In connection with a statistical survey, that is not designed to produce valid, reliable results that can be generalized to the universe of study;**
- **Require the use of a statistical classification that has not been reviewed and approved by OMB;**
- **Include 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**
- **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.**

If DHS/ICE/FPS identifies any determination issues during the background check, DHS/ICE/FPS would contact the contractor directly to address those issues. The contractor would then have 15 days to respond to inquiries made by DHS/ICE/FPS within 15 calendar days. If the contractor failed to submit security documents or respond completely to inquiries made by the DHS/ICE/FPS within 15 calendar days, the applicant would no longer be considered for an unescorted access determination and the GSA requesting official, contractor, and contracting company will be notified of this decision in writing.

If the initial result for a contractor's unescorted access determination is unfavorable, DHS/ICE/FPS would provide a written notification to the contractor identifying the specific reasons for proposing to deny the contractor's participation in the contract due to the unfavorable determination. DHS/ICE/FPS would allow the contractor 30 days to respond in writing to the proposed decision. After 30 days, or after receiving the contractor's response, DHS/ICE/FPS would make the final determination and respond in writing to the requesting official and the contractor on the final determination. In the case of a final unfavorable determination, DHS/ICE/FPS notifies the requesting official.

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.

A request for public comments will be published at _______________.

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

Not applicable.

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

The Temporary Contractor Information Worksheet includes a Privacy Act Notice in compliance with the Privacy Act of 1974 and as authorized by the Federal Property and Administrative Services Act of 1949. The entire notice states:

> In compliance with the Privacy Act of 1974, the following information is provided: Solicitation of information contained herein may be used as a basis for physical access determinations. GSA describes how your information will be maintained in the Privacy Act system of record notice published in the Federal Register at 73 FR 35690 on June 24, 2008. Your social security number is being requested pursuant to Executive Order 9397. Disclosure of the information by you is voluntary. Failure to provide information requested on this form may result in the government's inability to grant unescorted physical access to GSA-controlled facilities and may affect your prospects for employment or continued

employment under a government contract, or at a Federal facility, or with a government license.

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.**

No questions of a sensitive nature are included.

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 estimated number of respondents annually is **24,480** contractors, with each respondent requiring **.25** hours to complete the form, for a total of **6,120** hours. The estimate of 24,480 respondents is based on 20,400 total number of GSA contractors investigated by DHS/ICE/FPS for FY2008, plus a 20% increase expected for FY2009 for background check requests related to the American Recovery and Reinvestment Act of 2009.

GSA contractors would only complete the Temporary Contractor Information Worksheet once.

The majority of contractors investigated by DHS/ICE/FPS are Public Buildings Services (PBS) contractors. The average hourly wage rate for PBS contractors is **$39.00**. The annualized cost of burden hrs to respondents was calculated by multiplying average hourly wage rate for PBS contractors to estimated total burden hrs to respondents per year.

Total Annual Requests	24,480
Frequency of Response	1
Estimated Hours/Response	.25
Estimated Total Burden Hours/Year	6,120
Average Cost/hour	$39.00
Annualized cost of budren hrs to respondents	$238,680.00

Note: There will be no increase in the burden to the public. This information being collected on the Temporary Contractor Information Worksheet is the same information that was collected by the Federal Protective Service 176 Form used previously.

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) 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 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.**
- **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.**

Since Temporary Contractor Information Worksheet respondents do not have to record or maintain the information provided, there is no cost to the respondents except for the hours cited in Item 12.

14. **Provide estimates of annualized costs to the Federal Government. Also, provide a description of the method used to estimate cost, which should include qualification 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.

The estimated burden hours to the Federal Government is **3,917** hours annually. Reviewing and processing each response should take approximately **.16** hours; the total number of responses is estimated to be **24,480** contractors each year. 24,480 responses x .16 hour = 3,917 hours.

The estimated cost of Temporary Contractor Information Worksheet reviews to the Government is based on the 3,917 burden hours to the Government, using the annual cost of a Government Program Analyst, grade 11, step 5, paid $56,148 annually (not including locality adjustment): **$26.90** per hour x **3,917** hours =**$105,367.30**.

In addition to cost of labor to review Temporary Contractor Information Worksheets, cost of shipping and printing was estimated. GSA would transmit the Temporary Contractor Information Worksheet to DHS/ICE/FPS by email, fax, FedEx, or courier. FedEx is the only transmittal method that creates a noteworthy cost to GSA. **95%** or **23,256** of the Contractor Information Worksheets sent to DHS/ICE/FPS in FY2008 were submitted by FedEx. Average cost to FedEx (overnight standard) a Contractor Information Worksheet from GSA to DHS/ICE/FPS is **$4.73**. Shipping cost was estimated by multiplying average cost to FedEx (overnight standard) $4.73 by 23,256 estimated number of Temporary Contractor Information Worksheets. Printing cost per the 2-page Temporary Contractor Information Worksheet is estimated by cost of 2 pages of paper **$.06** multiplied by 24,480 estimated number of annual respondents.

Total Annual Requests	24,480	
Estimated Review Hours/Response	.16	
Estimated Total Burden Hours/Year	3,917	
Average Cost/hour	$26.90	
Cost of Budren Hrs to Government/Year	$105,367.30	
Printing Cost Per Temp. Contr. Info. Wkst.	$.06	
Total Annual Requests	24,480	
Cost of Printing/Year	$1,468.80	
FedEx Shipping Cost Per Temp. Contr. Info. Wkst.	$4.73	
Total Annual Requests Sent By FedEx	23,256	
Cost of Shipping/Year		$110,000.88
Cost of Budren Hrs to Govt/Year	$105,367.30	
Cost of Printing/Year	$1,468.80	
Cost of Shipping/Year		$110,000.88
Total Government Cost/Year	$216,836.98	

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

No changes have been made to items 13 and 14.

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.**

The results 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.**

GSA is not seeking approval to not display the expiration date for OMB approval of the information collection.

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

There are no exceptions to the certification statement identified in item 19, "Certification for Paperwork Reduction Act Submissions," for OMB Form 83-1.

B. Collections of Information Employing Statistical Methods

The agency should be prepared to justify its decision not to use statistical methods in any case where such methods might reduce burden or improve accuracy of results. When Item 17 on the Form OMB 83-I is checked, "Yes," the following documentation should be included in the Supporting Statement to the extent that it applies to the methods proposed:

1. Describe (including a numerical estimate) the potential respondent universe and any sampling or other respondent selection methods to be used. Data on the number of entities (e.g., establishments, State and local government units, households, or persons) in the universe covered by the collection and in the corresponding sample are to be provided in tabular form for the universe as a whole and for each of the strata in the proposed sample. Indicate expected response rates for the collection as a whole. If the collection had been conducted previously, include the actual response rate achieved during the last collection.

2. Describe the procedures for the collection of information including:

- Statistical methodology for stratification and sample selection,
- Estimation procedure,
- Degree of accuracy needed for the purpose described in the justification,
- Unusual problems requiring specialized sampling procedures, and
- Any use of periodic (less frequent than annual) data collection cycles to reduce burden.

3. Describe methods to maximize response rates and to deal with issues of non-response. The accuracy and reliability of information collected must be shown to be adequate for intended uses. For collections based on sampling, a special justification must be provided for any collection that will not yield “reliable” data that can be generalized to universe studied.

4. Describe any tests of procedures or methods to be undertaken. Testing is encouraged as an effective means of refining collections of information to minimize burden and improve utility. Tests must be approved it they call for answers to identical questions from 10 or more respondents. A proposed test or set of test may be submitted for approval separately or in combination with the main collection of information.

5. Provide the name and telephone number of individuals consulted on statistical aspects of the design and the name of the agency unit, contractor(s), grantee(s), or other person(s) who will actually collect and/or analyze the information for the agency

This section is not applicable for the purposes of the Temporary Contractor Information Worksheet.