

SUPPORTING STATEMENT

DRAFT (0704-TBD)

“Synchronized Predeployment and Operational Tracker (SPOT) System”

A. Justification

1. Need for Information Collection

In accordance with DoD Instruction 3020.41, “Contractor Personnel Authorized to Accompany the U.S. Armed Forces” and other appropriate policy and regulations, the DoD Components, shall ensure that contractors supporting contingency operations outside the United States enter data into the Synchronized Predeployment and Operational Tracker (SPOT) System before deployment. Additionally, in accordance with section 861 of Public Law 110-181 and a Memorandum of Understanding, the Department of State (DoS) and the United States Agency for International Development (USAID) shall ensure that contractors performing in Iraq and Afghanistan enter data into SPOT.

Data collection on contractors is a condition of their contract when DFARS 252.225-7040 is incorporated and persons who choose not to have data collected will not be entitled to employment opportunities which require this data to be collected.

The Department of Defense has designated the SPOT as the joint Web-based database to assist the Combatant Commander (CCDR) in maintaining awareness of the nature, extent, and potential risks and capabilities associated with contracted support in support of contingency operations, humanitarian or peacekeeping operations, or military exercises designated by the CCDR. In order to facilitate integration of contingency contractors and other personnel as directed by the Under Secretary of Defense for Acquisition, Technology, and Logistics (USD(AT&L)) or the CCDR, and to ensure accountability, visibility, force protection, medical support, personnel recovery, and other related support can be accurately forecasted and provided, these procedures shall apply for establishing, maintaining, and validating the database:

(1) The designated joint Web-based database (SPOT or its successor) shall:

(a) Serve as the central repository for up-to-date status and reporting on ALL DoD funded contingency contractor personnel as well as other personnel as directed by USD(AT&L), or by the CCDR.

(b) Track contract capability information for all DoD funded contracts supporting contingency operations, humanitarian or peacekeeping operations, or military exercises designated by the CCDR. Contract capability information shall provide planners and CCDRs an awareness of the nature, extent, and potential risks and capabilities associated with the contracted effort.

(c) Provide by-name accountability of all DoD funded contingency contractor personnel and other personnel as directed by USD(AT&L) or the CCDR.

(d) Contain, or link to, minimum contract information (e.g., contract number, company contact information, sponsoring (requiring activity) military unit contact information, and a summary of services or capability provided by the contract) necessary to establish and maintain accountability and visibility of the personnel and the contract capabilities in contingency operations, humanitarian or peacekeeping operations, or military exercises designated by the CCDR.

Section 861 of Public Law 110-181 required the identification of common databases among the DoD, DoS, and USAID to serve as repositories of information on contracts and contractor personnel in Iraq and Afghanistan. In a signed memorandum of understanding (MOU), the Agencies agreed that SPOT will serve as the interagency database for information on contractor personnel. Each Agency must require its contractors supporting operations in Iraq and Afghanistan to input information into SPOT and ensure data integrity.

2. Use of the Information

In accordance with appropriate acquisition policy and regulations, DoS and USAID funded contractors supporting operations in Iraq and Afghanistan and all DoD, awarded contracts that may potentially support contingency operations shall input employee data and maintain by-name accountability of contractor personnel into the designated database specified in their contract. Contractors are responsible for knowing the general location of their employees and ensuring the database contains up-to-date, real-time information reflecting all personnel deployed or to be deployed in support of contingency operations. Prime contractors are responsible for ensuring the database, SPOT or its successor, contains up-to-date, real-time information regarding their subcontractors at all tiers.

The information collected is required to maintain accountability for contractors who accompany the U.S. armed forces to support the U.S. Government.

The information is used to generate documents to approve travel, to contact contract and contractor company personnel regarding contractor deployees, and to record contractor deployee locations when staying or traveling in operational environments to support U.S. missions.

The system aggregates counts of persons according to related data, e.g., contract, company, sponsoring Government organization.

3. Information Technology

The use of information technology has been considered appropriate for the purposes of this collection. SPOT is a Web-based system.

4. Efforts to Identify Duplication

There is no duplication of data collection. This is the first time contractor data is collected by the DoD, DoS and USAID for these specific purposes.

5. Methods to Minimize Burden on Small Entities

The information collection associated with small businesses is the minimum consistent with applicable laws, Executive orders, regulations, and prudent business practices.

6. Consequences of Not Collecting the Data

If this data is not collected, the Department's ability to accurately maintain current records and budget appropriately will be limited and imprecise.

7. Special Circumstances

There are no special circumstances that require the collection to be conducted in a manner inconsistent with the guidelines in 5 CFR 1320.5 (d) (2).

8. Agency 60-Day Federal Register Notice and Consultations Outside the Agency

Public comments will be solicited in the Federal Register as required by 5 CFR 1320.8(d). A subsequent information collection package to be submitted under regular processing timeframes will address any comments received on the information collection.

9. Payments to Respondents

No payment or gift will be provided to respondents, other than remuneration of contractors under their contracts.

10. Assurance of Confidentiality

The information in SPOT is sometimes personal or sensitive; therefore, it contains built-in safeguards to limit access and visibility of this information. SPOT uses role-based security so a user sees only the information for which permission has been granted. Information is collected via secure entry (ssh port 43) on the web. The SPOT system is DIACAP certified having been subjected to and passed thorough security testing and evaluation by independent parties. It meets safeguards specified by the Privacy Act of 1974. SPOT is hosted in a secure facility.

The SPOT Privacy Act Systems of Records Notice was updated and published on July 29, 2008 (73 FR 43918).

11. Sensitive Questions

Questions of a sensitive nature such as sexual behavior and attitudes, religious beliefs, and other matters that are commonly considered private are not asked in this collection.

12. Estimates of Response Burden and Annual Cost to Respondent

(a) Estimated Average Annual Respondent Burden:

- (1) Responses per Respondent: 1 employee to 32,000 employees (average 231)
- (2) Number of Respondents: 1,300 companies
- (3) Hours per Response: 30 minutes (.5 hours)
- (4) Total Annual Burden Hours: 150,000 (300,000 individual records x .5 hrs)

Currently in the SPOT database, DoD, DoS and USAID have approximately 140,000 contractors registered (DoS - 1,646 in Afghanistan and 5,518 in Iraq; USAID - 511 in Iraq; and DoD 21,896 in Afghanistan and 107,286 in Iraq). Understanding that we do not yet have all contractors in Iraq in Afghanistan registered and assuming that we may expand the requirement to register contractors operating in contingency operations to other government agencies, we estimate that SPOT could have up to 300,000 individuals from approximately 1,300 separate companies registering in the system each year.

(b) Respondent Cost:

Total Annual Cost to Respondents: \$2,700,000 (150,000 hrs x \$18)
Cost to Individual Respondent: \$18 to \$576,000

The cost to respondent is based on the approximate salary of \$36.00 (rate per hour)/60 (minutes) = \$.6 per minute.

13. Estimates of Cost Burden for Collection of Information

There is no cost associated with these tools for the data submission. Completion and submission of the information is accomplished through a Web-based system.

14. Annual Cost to Government:

There are no administrative (printing, mailing, distributing and reviewing) since all action is taken through the Web-based system.

Annual contract for web-based system, technical services and hosting: \$6,000,000

15. Changes in Burden

Increase in burden due to a collection in use without an OMB Control Number.

16. Plan for Tabulation or Publication

The information collected will not be tabulated or published.

17. Approval to Avoid Display of the Expiration Date of OMB Approval.

Approval is not sought for avoiding display of the expiration date for OMB approval of the information collection.

18. Exception to Certification Statement

There are no exceptions to the certification accompanying this Paperwork Reduction Act submission.

B. Collection of Information Employing Statistical Methods.

Statistical methods will not be employed.