

# PUBLIC SUBMISSION

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## General Comment

It's my understanding that agencies are supposed to avoid duplication under the Paperwork Reduction Act. Most, if not all the information being asked for on the GSA 850 Temporary Contractor Information Worksheet (CIW) form is already being provided on the FD-258 fingerprint card/chart. The only items not available on the card/chart, to my knowledge, are the following:

- 12. E-mail Address (optional)
- 13. Daytime Phone Number
- 14. Cell Phone Number
- 18. Position (Job) Title

There is even a "Miscellaneous Number" block available to insert any other citizenship/alien number if necessary.

I have to question the need for GSA to know a person's phone cell phone numbers or position (job) title especially when those items are not even required on an SF85 or SF85P. Why does GSA feel a need to collect information of Temporary Contractors above and beyond what is collected by contractors and federal

employees for background investigations? If a person's telephone number is really necessary, then it would seem that GSA could use the SF85P to collect this information. Is there any reason why GSA can't simply collect this information using already approved forms like the OF306, SF85 or SF85P in lieu of creating a whole new form to serve the same purpose? This Form 850 seems eerily reminiscent of the old GSA Form 176, issued under OMB # 3090-0006, that was "disapproved" by OMB on 02.07.1989. OMB indicated that the disapproval was based on the fact that the SF85 (non-Sensitive position) "provides all necessary information including arrest information and citizenship certification." That disapproval went on to direct GSA to send OMB, by 04.01.89, "a copy of its memorandum directing regions to discontinue using this form GSA 176, and to substitute the SF 85." In my opinion, the same argument could seem to apply for 'disapproving' the proposed GSA Form 850.