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Subject Fw: Draft response to comment on comment on Federal Register
Document E9-11315 (GSA Form 850 - Temporary Contractor
Information Worksheet)

Ms Loftin

Thank you for providing your comment on the Federal Register Document E9-11315 for General Services Administration (GSA) Form 850 - Temporary Contractor Information Worksheet. You commented that the information collected in GSA Form 850 duplicates information collection efforts and is not necessary. You also suggested that pre-existing approved forms could be used in place of GSA Form 850. In response to your comment, the information collected using GSA Form 850 is necessary, does not duplicate efforts, and can not be collected using a pre-existing form for the following reasons:

- GSA Form 850 authorizes GSA's background investigation and fingerprint check service provider, US Department of Homeland Security, Federal Protective Service (FPS), to conduct the necessary fingerprint checks on an applicant to grant the applicant unescorted physical access to GSA-controlled facilities. GSA Form 850 provides this authorization by including the following notifications and signature requirement: Purpose of the information collection; authority to request the information; background check process; authorization and release statement; Privacy Act of 1974 compliance information and routine uses; public burden reporting statement; and responsibility for granting final determination on access provisioning; and signature for authorization, release and certification. All of these notifications and signature for authorization, release and certification are not included on the Federal Bureau of Investigation (FBI) Form FD-258.
- The information such as GSA building number, name, and address, company and GSA requesting official point of contact name and contact information, and contract information that is collected on GSA Form 850 but not collected on FBI Form FD-258 enables GSA to tie the applicant to GSA contracts and buildings and provide the results of the applicant's fingerprint check to the applicant's company's point of contact and GSA requesting official.
- The applicant's contact information is required in the event that GSA or FPS need to contact the applicant regarding their physical access requirements for their position or fingerprint check. In addition, the contact information advances GSA's Continuity of Operations Plan (COOP) emergency preparedness.
- The applicant's position (job) title is required to help GSA verify the applicant's access requirements and eligibility to use GSA Form 850. GSA Form 850 is only for GSA temporary contractors working on American Recovery and Reinvestment Act of 2009 (ARRA) efforts and do not require Information Technology (IT) access. For example, if an applicant indicates on GSA Form 850 that her position title is IT System Administrator, then the applicant would a higher level of background investigation than just a fingerprint check, and GSA would require the applicant to complete the appropriate background investigation form rather than GSA Form 850. In addition, GSA processes thousands of fingerprint check requests for contractors each year and uses position (job) title to verify a contractor's identity and corresponding access determinations.
- Other pre-existing approved forms such as OF306, SF85, and SF85P do not collect all of the information such as GSA building number, name, and address, company and GSA requesting official point of contact name and contact information, and contract information required by GSA for physical access eligibility determination, which is vital to safeguarding Federal assets.
- Unlike other pre-existing approved forms such as OF306, SF85, and SF85P, GSA does not require nor

collect information such as selective service, convictions, relatives working in the Federal Government, previous places of residence, education, previous employment, and personal references, thus avoiding excessive data collection.

GSA appreciates your commenting on GSA Form 850. Your concerns are of great importance to GSA, and GSA has taken great care to avoid duplication of effort and collect only required information for GSA physical access eligibility determination through GSA Form 850.

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