

83-I SUPPORTING STATEMENT

By Defense Security Service (DSS)

“Voice of Industry Survey” OMB (#TBD)

A. Justification

1. Need for Information Collection

Executive Order 12829, “National Industrial Security Program (NISP)” Section 202 (a) directs that the Secretary of Defense serve as the Executive Agent for inspecting and monitoring “the contractors, licensees, and grantees who require or will require access to, or who store or will store classified information”; and, for determining the eligibility for access to classified information of contractors, licensees, and grantees and their respective employees. The specific requirements necessary to protect classified information released by U.S. Government agencies to contractors are set forth in the “National Industrial Security Program Operating Manual (NISPOM)” (DoD 5220.22-M). The Secretary of Defense, as Executive Agent, has the authority to issue, after consultation with affected agencies, standard forms or other standardization that will promote implementation of the NISP. Contractors participating in the NISP are subject to an initial Facility Security Clearance (FCL) Survey and periodic security inspections to determine their eligibility to participate in the NISP and to ensure that safeguards employed are adequate for the protection of classified information.

2. Use of the Information

Department of Defense Directive, 5105.42, “Subject: Defense Security Service”, delineates the mission, functions and responsibilities of DSS. In accordance with this directive, DSS is an agency of the Department of Defense, currently under the authority of the Under Secretary of Defense for Intelligence (USD(I)). As it pertains to this request for authority to collect information, DSS is responsible for the following:

- (a) Administering and implementing the Defense portion of the NISP for DoD and 23 other non-DoD agencies pursuant to EO 12829.
- (b) Exercising authority delegated to the Secretary of Defense for the issuance of security clearances to contractor employees, pursuant to EO 12829.

DSS is the repository of records related to the maintenance of information pertaining to facility clearances and security information regarding those cleared contractors in the NISP that are under DSS security cognizance. The information is used to assess and advise Government Contracting Activities (GCAs) regarding the contractor’s ability to protect classified information in its possession and to respond to inquiries regarding the facility clearance status and storage capability of cleared contractors. This survey will provide feedback on DSS performance with respect to the administration and implementation of the NISP.

3. Information Technology

Information technology has been considered and used as appropriate for the purposes of this collection. DSS sends an email invitation to complete the Voice of Industry Survey directly to a designated point of contact at the contractor facility. The email invitation includes a secure link to access and complete the online survey.

4. Efforts to Identify Duplication

The Voice of Industry Survey is a new methodology to collect information with regard to DSS administration and implementation of the National Industrial Security Program. The objective of this inquiry is to evaluate DSS performance and has not been implemented in the past.

5. Methods to Minimize Burden on Small Entities

The collection of information does not have a significant impact on small businesses or other entities. DSS is requesting the minimum amount of information necessary for evaluation and participation by eligible contractors participating in the NISP strictly on a voluntary basis.

6. Consequences of Not Collecting the Data

If this data is not collected, DSS will not have the ability to objectively evaluate performance related to the administration and implementation of the NISP as outlined in Executive Order (EO) 12829.

7. Special Circumstances

There are no special circumstances affecting this collection.

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

The Notice was posted to the Federal Register on November 16, 2009 as document number 2009-27372 with consideration for comments from the public. No comments were received.

9. Payments to Respondents

No payments or gifts will be provided to respondents.

10. Assurance of Confidentiality

Responses to questions on the Voice of Industry Survey may be considered by the respondent to be company proprietary information. Information provided by the responding contractors will be handled by DSS as "For Official Use Only," sensitive commercial information. This advisement will be contained in the instruction package to the contractor.

11. Sensitive Questions

There are no sensitive questions asked in this collection as defined by the OMB 83-I Instruction, 10/95.

12. Estimates of Response Burden and Annual Cost to Respondent

(a) Estimated Average Annual Respondent Burden:

- (1) Responses per Respondent: 1
- (2) Number of Respondents: 12,938
- (3) Hours per Response: 30 minutes
- (4) Total Annual Burden Hours: 6469

(b) Respondent Cost

Total Annual Cost to Respondents: \$275,967.54 (12,938 x \$21.33)
 Cost to Individual Respondent: \$21.33 (\$.711 per minute x 30 minutes)

(c) The cost to respondent is based on the approximate salary of a GS-13 Step 1 (FY09 basic pay): \$42.66 (rate per hour)/60 (minutes) = \$.711 per minute.

13. Estimates of Cost Burden for Collection of Information

There is no cost associated with these tools for the survey submission. Completion and submission of the Survey questionnaire online requires an email address and Internet access, tools which cleared contractor facilities already have in place or can access through a local library.

14. Annual Cost to Government:

(a) There are no administrative costs (printing, mailing, distributing and reviewing) since all action is taken through email and online survey tool.

(b) Explanation of Administrative Costs: not applicable.

(c) Survey Development and Maintenance Costs: \$63,323.00

(d) Explanation of Survey Development and Maintenance Costs:

(1) Annual contract with survey vendor for web-based survey tool and technical services: \$50,000

(2) Personnel:

Number	Average Grade/Rank	Average Salary/hr (DC area FY08)	Average Hours	Cost
1	GS-15 Step 5	\$67.21	20	\$1,344. = \$67.21 X 20

1	GS-14 Step 8	\$62.17	28	\$1,741 = \$62.17 X 28
2	GS-13 Step 1	\$42.66	120	\$10,238 = (\$42.66 X 120)X 2

(e) Total Cost to the Government: \$63,323.00

15. Explanation of program change / adjustment reported in Item 13, OMB 83-I

This is a new collection.

16. Plan for Tabulation or Publication

There are no plans to formally publish the information collected. The data is analyzed and reported to DSS senior leadership for an assessment determination of DSS performance as per administration and implementation of the NISP, pursuant to Executive Order 12829.

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 is no exception t the certification statement.

B. Collection of Information Employing Statistical Methods

1. Describe the potential respondent universe and any sampling or other respondent selection method to be used. Data on the number of entities in the universe and the corresponding sample are to be provided in tabular form. The tabulation must also include expected response rates for the collection as a whole. If the collection has been conducted before, provide the actual response rate achieved.

The respondent universe is all 12,938 active, cleared industry facilities under the NISP. The survey is deployed to one central point of contact for a facility. As a complete census sampling, there is no selection method to be used. The expected response rate to the collection is 85%+.

2. Describe the procedures for the collection, including: the statistical methodology for stratification and sample selection; the estimation procedure; the degree of accuracy needed for the purpose described in the justification; any unusual problems requiring specialized sampling procedures; and any use of periodic (less frequent than annual) data collection cycles to reduce burden.

The survey is sent to the Facility Security Officer (FSO) using a web based survey tool with an e-mail invite. The determination to conduct this survey on a continuing or annual basis, will be based on responses from this current collection.

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

DSS will notify selected survey participants prior to deployment of the collection effort. During the data collection period, non-respondents will receive weekly e-mail reminders to ensure timely completion of the survey. Additionally, DSS maintains a high working relationship with the respondent field and has consistently experienced high response rates on similar data collection efforts.

4. Describe any tests of procedures or methods to be undertaken. Tests are encouraged as effective means to refine collections. However, if ten or more test respondents are involved, OMB must give prior approval under the Paperwork Reduction Act.

Historically, DSS has implemented an annual cost analysis survey using similar collection methods with high confidence of success.

5. Provide the name and telephone number of individuals consulted on the 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.

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Defense Security Service Industrial Security Field Office Quality Assurance