

## **SUPPORTING STATEMENT**

### **Justification for:**

Background Investigation Inquiry Forms, PD F

- 1. Explain the circumstances that make the collection of information necessary. Identify any legal or administrative requirements that necessitate the collection.** Executive Order 10450 requires agency heads to classify positions for sensitivity in relation to national security or suitability for federal employment. An investigation appropriate to the sensitivity level is required on each person employed by the Government to determine that the employment is clearly consistent with the interest of the Government. This order also grants the U.S. Office of Personnel Management oversight responsibility for its implementation Government-wide. Executive Order 12968 establishes a uniform Federal personnel security program for employees who will be considered for initial or continued access to classified information. The Bureau of the Public Debt (BPD) has traditionally used the services of the Office of Personnel Management to conduct the required background investigations on BPD employees and contractors. However, in 2006, OPM formally delegated that task to BPD with the condition that BPD conduct these investigations adhering to EO 12968 and OPM standards for the position sensitivity investigation specified in the OPM Handbook. Several of the required investigation types require a written inquiry be used to contact the listed references of the employees/contractors, to verify a college degree, or to contact a local police agency. In the past, this function was performed by OPM, however, under the delegation and to adhere to OPM guidelines, BPD must now assume this role and responsibility. BPD can not perform its' mandated role of conducting the required background investigations that adhere to federal law without having these forms.
- 2. Indicate how, by whom, and for what purpose the information is to be used.** Information is for use solely by the Bureau's Personnel Security Section. Specifically, the inquiries are used on a case-by-case basis when the collection of this data is specifically prescribed in this manner. After these forms are returned, the information provided is analyzed within

the context of the background investigation by the investigator to provide a general overview of a person's character and reputation.

- 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. What consideration is given to use information technology to reduce burden?**

Public Debt has been a leader in e-Gov, providing the public with options for conducting financial transactions online for several years. To provide our customers additional options for submitting information electronically, we are taking the following steps: a technical project team is exploring options (such as pay.gov) and will select the mechanism(s)/infrastructure needed; concurrently, reengineering of business processes (and forms) is being conducted as the result of a reorganization of our major business lines.

- 4. Describe efforts to identify duplication. Why can't any similar information already available be used or modified for use for the purposes described in item 2 above?** Duplicate information is not requested.
- 5. If the collection of information impacts small business or other small entities describe any methods used to minimize burden?** This collection of information does not impact small business or other small entities.
- 6. What consequences to Federal program or policy activities and what, if any, technical or legal obstacles to reducing burden will occur if this collection is not conducted or is conducted less frequently?** N/A
- 7. Is this collection of information conducted in a manner consistent with the guidelines of 5 CFR 1320.6?** The collection of information cannot be conducted less frequently because the collection is initiated for a single purpose.

8. **What effort was made to notify the general public about this collection of information?** The Bureau's notice was published in the Federal Register on July 6, 2010, Page 38868. No comments were received.
9. **What decision was made to provide any payment or gift to respondents, other than reenumeration of contractors or grantees?** N/A
10. **What assurance of confidentiality was provided to respondents and what was the basis for the assurance in statute, regulations, or agency policy?** All information is voluntarily provided by the respondent to enable the Bureau of the Public Debt to make a determination about an individual's suitability for employment or a security clearance. The information provided may be disclosed to the person being investigated and to other federal agencies unless the respondent requests confidentiality in their responses.
11. **What justification is there for questions of a sensitive nature?** There are no questions of a sensitive nature.
12. **What is the estimated hour burden of this collection of information?** The average time needed is 10 minutes per response multiplied by the estimated number of responses (2,160) reflects the total burden of 360 hours.
13. **What is the estimated total annual cost burden to respondents or recordkeepers resulting from this collection of information?** Estimated cost burden to respondents is not available.
14. **What is the annualized cost to the Federal Government?** The following factors were used to estimate the annual burden to this agency:
- a. Printing cost - estimated number of forms printed annually, multiplied by the unit cost of the forms.
  - b. Case processing cost - estimated number of forms completed, multiplied by a percentage of the unit cost of case processing.
  - c. Forms management cost - salary cost of forms management personnel.

Printing Cost	2,160 @	\$.05 each	= \$108.00
Case Processing Cost	2,160	1.50/form	= 3240.00
Forms Management Cost			= <u>500.00</u>
Total Cost			\$ 3,848.00

15. **What is the reason for any program changes or adjustments reported in Items 13 or 14 of the OMB Form 83-I?**  
An increase of 173 hours is due to an adjustment in estimate based an increase in the number of investigations.
16. **For collections of information whose results will be published, outline plans for tabulation and publication.** The results of the collection of this information will not be published for statistical use.
17. **If seeking approval to not display the expiration date for OMB approval of this information collection, what are the reasons that the display would be inappropriate?**  
Display of the expiration date may confuse respondents to believe that information is required by a date other than that specified by the sponsor.
18. **What are the exceptions to the certification statement?** N/A