

**SUPPORTING STATEMENT A
FOR PAPERWORK REDUCTION ACT STATEMENT SUBMISSION**

**UNITED STATES PARK POLICE PERSONAL HISTORY STATEMENT
OMB CONTROL NUMBER 1024-0245**

Terms of Clearance: None

**1. Explain the circumstances that make the collection of information necessary.
Identify any legal or administrative requirements that necessitate the collection.**

The United States Park Police (USPP) is a unit of the National Park Service, Department of the Interior, with jurisdiction in all National Park Service areas and certain other Federal and state lands. The USPP are highly trained and professional police officers who prevent and detect criminal activity; conduct investigations; apprehend individuals suspected of committing offenses against Federal, state and local laws; provide protection to the President of the United States and visiting dignitaries; and provide protective services to some of the most recognizable monuments and memorials in the world.

Applicants for USPP officer positions must complete and pass a competitive written examination, an oral interview, a medical examination and psychological evaluation, and a battery of physical fitness and agility tests. As part of this application process, we (National Park Service) use USPP Form 1 (United States Park Police Personal History Statement) to collect detailed personal history information from applicants. Our authority to collect this information is derived from one or more of the following: Title 5, Code of Federal Regulations, section 5.2; Title 5, United States Code, sections 1302, 1304, and 3301; sections 8(b), 8(c), and 9(c) of Executive Order 10450; and Title 42, United States Code, section 2455.

**2. Indicate how, by whom, and for what purpose the information is to be used.
Except for a new collection, indicate the actual use the agency has made of the
information received from the current collection. Be specific. If this collection is
a form or a questionnaire, every question needs to be justified.**

Applicants seeking employment as a USPP officer complete USPP Form 1 to provide information on their personal history. Investigators verify the information provided and use it to determine an applicant's suitability for a USPP officer position. If an applicant is hired, USPP Form 1 becomes part of the employee's security file. If an applicant is not hired, the form is kept secured and later destroyed in accordance with the Office of Personnel Management's disposal of documents requirements. We collect:

- Personal Data.
- Selective Service information.
- Military data.
- Financial data.

- References.
- Residence data.
- Education information
- Employment information.
- Driving record.
- Arrest/conviction data.
- Criminal history information.
- Gambling information.
- Miscellaneous information such as firearm permits, special skills, other languages, hobbies and interests, other enforcement agencies where applicant applied, whether or not applicant previously applied for a USPP officer position.

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, e.g., permitting electronic submission of responses, and the basis for the decision for adopting this means of collection. Also describe any consideration of using information technology to reduce burden and specifically how this collection meets GPEA requirements.

As of August 2010, USPP Form 1 is a fillable Adobe file that applicants can download, save, and reopen as it is being completed. Transactions are quicker and easier for the applicant and tailored for a better explanation of certain necessary questions. Electronic access and the ability to edit the saved version greatly improve the process. This kind of access and ease of data retrieval is a significant improvement over the paper-based approach. Applicants may print the blank form and complete it in writing if they prefer. Regardless of how it is completed, applicants must bring a printed, hard-copy version of the completed form when they come for the physical evaluation. We are pursuing an electronic submission alternative for future consideration.

4. Describe efforts to identify duplication. Show specifically why any similar information already available cannot be used or modified for use for the purposes described in Item 2 above.

USPP Form 1 is a unique form in the Federal government because the USPP applicant screening process is different. Other agencies ask for similar and possibly identical information; however, they do so at different points throughout the applicant screening and hiring process. The USPP relies on this form as a single source of information collected in multiple forms by other agencies. There is no other form that asks the detailed questions necessary for USPP to adequately screen candidates for the critical sensitive position of a USPP officer. We do not have access to personal history information an applicant may have provided to another agency.

- 5. If the collection of information impacts small businesses or other small entities, describe any methods used to minimize burden.**

This collection of information does not impact small businesses or other small entities.

- 6. Describe the consequence to Federal program or policy activities if the collection is not conducted or is conducted less frequently, as well as any technical or legal obstacles to reducing burden.**

If the information were not collected, the USPP would not be able to hire adequately screened applicants for USPP officer positions. This would adversely affect the protection and preservation of monuments and memorials, the protection of visitors, and our ability to detect and deter crime.

- 7. Explain any special circumstances that would cause an information collection to be conducted in a manner:**
- * requiring respondents to report information to the agency more often than quarterly;**
 - * requiring respondents to prepare a written response to a collection of information in fewer than 30 days after receipt of it;**
 - * requiring respondents to submit more than an original and two copies of any document;**
 - * requiring respondents to retain records, other than health, medical, government contract, grant-in-aid, or tax records, for more than three years;**
 - * in connection with a statistical survey that is not designed to produce valid and reliable results that can be generalized to the universe of study;**
 - * requiring the use of a statistical data classification that has not been reviewed and approved by OMB;**
 - * that includes a pledge of confidentiality that is not supported by authority established in statute or regulation, that is not supported by disclosure and data security policies that are consistent with the pledge, or which unnecessarily impedes sharing of data with other agencies for compatible confidential use; or**
 - * requiring respondents to submit proprietary trade secrets, or other confidential information, unless the agency can demonstrate that it has instituted procedures to protect the information's confidentiality to the extent permitted by law.**

There are no circumstances that require us to collect the information in a manner inconsistent with OMB guidelines.

- 8. If applicable, provide a copy and identify the date and page number of publication in the Federal Register of the agency's notice, required by 5 CFR 1320.8(d), soliciting comments on the information collection prior to submission to OMB. Summarize public comments received in response to that notice and in response to the PRA statement associated with the collection over the past three**

years, and describe actions taken by the agency in response to these comments. Specifically address comments received on cost and hour burden.

Describe efforts to consult with persons outside the agency to obtain their views on the availability of data, frequency of collection, the clarity of instructions and recordkeeping, disclosure, or reporting format (if any), and on the data elements to be recorded, disclosed, or reported.

Consultation with representatives of those from whom information is to be obtained or those who must compile records should occur at least once every three years — even if the collection of information activity is the same as in prior periods. There may be circumstances that may preclude consultation in a specific situation. These circumstances should be explained.

On May 17, 2010, we published in the Federal Register (75 FR 27574) a notice of our intent to request that OMB renew this information collection. In that notice, we solicited comments for 60 days, ending on July 16, 2010. We did not receive any comments in response to that notice.

In addition to the Federal Register notice, the USPP contacted several former applicants to get feedback on how long it took them to complete USPP Form 1 and the necessity and clarity of the form:

Zakiyyah Taheera Mahasin
1181 Main Street – Apt. #5D
Rahway, NJ 07065
(908) 487-1815

Ms. Mahasin stated that the process to complete USPP Form 1 took approximately 1 week. This time was necessary because some required information was not readily available to her, and she had to request some information via mail. The entire process was not bothersome because she completely understood the need for such detailed checks on potential employees.

Pedro (NMN) Rancier
1735 Purdy Street – Apt. 4A
Bronx, NY 10462
(646) 270- 0632

Mr. Rancier believed the form was very extensive. He also felt several questions were repeated. He stated he liked the essay requirement because it allows the agency to see the person in a broader perspective instead of just looking at their addresses and work experiences.

Sean Robert Kellenberger
21 Holton Street – Apt. #1

Alston, MA 02134
(631) 905-6220

Mr. Kellenberger stated that filling out USPP Form 1 was straightforward. Coming from the military, he thought it was routine to account for his past addresses and employment experiences. Additionally, he felt the majority of society might think the form asks for a lot of personal information, but that people who feel that way should not become police officers. As part of the form, he said he would have liked to have seen a place where an applicant can address or ask questions about the job and appointment process, or any other areas not covered or asked about on the form. He didn't feel the questions were invasive, and he was able to clearly understand what was being asked.

Very little information being requested is repeated. Some information is asked more than once for the convenience of the reviewers, who are reviewing 800-1000 submissions. It would be cumbersome to require them to flip back and forth through a 60-page document to confirm previously provided information.

The USPP Form 1 is not the right place for asking questions about the job and appointment process. These questions should have been answered well before this point in the process.

9. Explain any decision to provide any payment or gift to respondents, other than remuneration of contractors or grantees.

We do not provide any payments or gifts to respondents.

10. Describe any assurance of confidentiality provided to respondents and the basis for the assurance in statute, regulation, or agency policy.

All copies are stored in compliance with OPM/Govt-5 (5 CFR 297) in secure areas in locked file cabinets and treated as confidential information. Only individuals with a need to use the information have access. The information collection complies with the Privacy Act of 1974 and OMB Circular A-130. Such information may be exempt from disclosure under the FOIA (5 U.S.C. 552).

11. Provide additional justification for any questions of a sensitive nature, such as sexual behavior and attitudes, religious beliefs, and other matters that are commonly considered private. This justification should include the reasons why the agency considers the questions necessary, the specific uses to be made of the information, the explanation to be given to persons from whom the information is requested, and any steps to be taken to obtain their consent.

We ask questions of a personal nature essential to determining the suitability of an applicant for employment as a USPP officer; however, we do not ask sensitive questions such as those above.

12. Provide estimates of the hour burden of the collection of information. The statement should:

- * Indicate the number of respondents, frequency of response, annual hour burden, and an explanation of how the burden was estimated. Unless directed to do so, agencies should not conduct special surveys to obtain information on which to base hour burden estimates. Consultation with a sample (fewer than 10) of potential respondents is desirable. If the hour burden on respondents is expected to vary widely because of differences in activity, size, or complexity, show the range of estimated hour burden, and explain the reasons for the variance. Generally, estimates should not include burden hours for customary and usual business practices.**
- * If this request for approval covers more than one form, provide separate hour burden estimates for each form and aggregate the hour burdens.**
- * Provide estimates of annualized cost to respondents for the hour burdens for collections of information, identifying and using appropriate wage rate categories. The cost of contracting out or paying outside parties for information collection activities should not be included here. Instead, this cost should be included under “Annual Cost to Federal Government.”**

We estimate 3,000 individuals will apply annually for the position of a USPP officer. Of this total, approximately 1,000 applicants will pass initial screening tests and complete USPP Form 1. We estimate it will take 8 hours to complete the form, including time to gather information and read instructions.

We estimate the dollar value of the annual burden hours to be \$230,160. We used Bureau of Labor Statistics news release USDL 10-1241, September 8, 2010, Employer Costs for Employee Compensation—June 2010 (<http://www.bls.gov/news.release/pdf/ecec.pdf>), to estimate average hourly wages and to calculate benefits. Table 1 estimates the hourly wage for all workers to be \$20.55. We multiplied this rate by 1.4 to calculate benefits, resulting in an hourly rate of \$28.77.

REQUIREMENT	TOTAL ANNUAL RESPONSES	BURDEN HOURS PER RESPONSE	TOTAL ANNUAL BURDEN HOURS	HOURLY LABOR COSTS INCLUDING BENEFITS	TOTAL DOLLAR VALUE OF ANNUAL BURDEN HOURS
USPP Form 1	1,000	8	8,000	\$ 28.77	\$ 230,160

13. Provide an estimate of the total annual non-hour cost burden to respondents or recordkeepers resulting from the collection of information. (Do not include the cost of any hour burden already reflected in item 12.)

- * The cost estimate should be split into two components: (a) a total capital and start-up cost component (annualized over its expected useful life) and (b) a total operation and maintenance and purchase of services component. The estimates should take into account costs associated with generating,**

- maintaining, and disclosing or providing the information (including filing fees paid for form processing). Include descriptions of methods used to estimate major cost factors including system and technology acquisition, expected useful life of capital equipment, the discount rate(s), and the time period over which costs will be incurred. Capital and start-up costs include, among other items, preparations for collecting information such as purchasing computers and software; monitoring, sampling, drilling and testing equipment; and record storage facilities.**
- * If cost estimates are expected to vary widely, agencies should present ranges of cost burdens and explain the reasons for the variance. The cost of purchasing or contracting out information collection services should be a part of this cost burden estimate. In developing cost burden estimates, agencies may consult with a sample of respondents (fewer than 10), utilize the 60-day pre-OMB submission public comment process and use existing economic or regulatory impact analysis associated with the rulemaking containing the information collection, as appropriate.**
 - * Generally, estimates should not include purchases of equipment or services, or portions thereof, made: (1) prior to October 1, 1995, (2) to achieve regulatory compliance with requirements not associated with the information collection, (3) for reasons other than to provide information or keep records for the government, or (4) as part of customary and usual business or private practices.**

The total nonhour annual cost burden is \$11,100. Although USPP Form 1 is available in a fillable format, applicants must print the form and have it notarized. We estimate the cost for printing each form is \$6.10 (61 pages @ \$0.10 per page). The notarization fee for each form is approximately \$5.00. The nonhour burden cost for each form is \$11.10 x 1,000 forms = \$11,100.

14. Provide estimates of annualized cost to the Federal government. Also, provide a description of the method used to estimate cost, which should include quantification of hours, operational expenses (such as equipment, overhead, printing, and support staff), and any other expense that would not have been incurred without this collection of information.

We estimate the total annual cost to the Federal Government is \$24,560 (salary plus printing costs). Of the 1,000 applicants who complete USPP Form 1, approximately 800 will pass the physical examination. A panel of USPP officers, background investigators, and human resources specialists convene to review the Forms to verify the information and screen for applicant suitability. The class, subclass, step, grade, and years of service of employees who work with this information collection vary. The panel meets for 2 days for an average of 13 hours each day (26 hours) to review the 800 forms.

SALARY COSTS - \$24,360 (rounded) (\$936.91 X 26 hours)

POSITION	HOURLY PAY RATE	HOURLY RATE WITH	TOTAL HOURLY COST (hourly benefit rate X no.
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		BENEFITS***	of employees)
*4 Sergeants 4/5 - 22	\$ 51.20	76.80	\$ 307.20
*3 Officers 1/1 - 4	\$ 40.48	60.72	\$ 182.16
**2 Background Investigators GS-12/step	\$ 40.86	61.29	\$ 122.58
*2 Detectives 3/4 - 15	\$ 47.03	70.55	\$ 141.10
3 HR Specialists GS 9-11/step 5	\$ 40.86	61.29	\$ 183.87
Total			\$ 936.91

* Hourly rate based on the United States Park Police Law Enforcement Pay Equity Act of 2000, Washington, DC Locality Pay Table.

**Hourly rate based on the Office of Personnel Management Salary Table 2010-DCB.

*** To calculate benefits, we multiplied the hourly pay rate by 1.5 in accordance with Bureau of Labor Statistics news release USDL 10-1241, September 8, 2010, Employer Costs for Employee Compensation—June 2010.

PRINTING COSTS - \$200

USPP Form 1 is available in a fillable format; however, we will provide a hard copy to those who (1) do not have access to a computer or (2) for some other reason want to complete the hard copy version. We estimate this printing cost to be \$200.

15. Explain the reasons for any program changes or adjustments in hour or cost burden.

We are estimating 1,000 annual responses and 8,000 burden hours for this collection, which is an adjustment increase of 400 responses and 3,200 burden hours. We increased the number of responses based on our experience in administering this collection.

We are reporting as a program change \$11,100 for printing and notarization costs as explained in item 13. Printing costs were not applicable in previous submissions because the form was provided as a hard copy. The requirement to have the Form notarized has always been required; however, we have not previously included the cost.

16. For collections of information whose results will be published, outline plans for tabulation and publication. Address any complex analytical techniques that will be used. Provide the time schedule for the entire project, including beginning and ending dates of the collection of information, completion of report, publication dates, and other actions.

We will not publish the results of this information collection.

17. If seeking approval to not display the expiration date for OMB approval of the information collection, explain the reasons that display would be inappropriate.

We will display the OMB control number and expiration date on USPP Form 1.

18. Explain each exception to the topics of the certification statement identified in "Certification for Paperwork Reduction Act Submissions."

There are no exceptions to the certification statement.