

Department of Justice
Bureau of Alcohol, Tobacco, Firearms and Explosives
1140-0058
Supporting Statement – Information Collection Requirement
ATF F 8620.7
Investigator Integrity Questionnaire

A. Justification

1. Pursuant to a Memorandum of Understanding and Agreement, hereinafter referred to as an MOU, between the Office of Personnel Management (OPM) and the Bureau of Alcohol, Tobacco and Firearms (ATF), dated March 3, 2000, ATF has been authorized to use contract investigators and/or its own investigative employees to conduct background investigations. Personnel security and suitability background investigations, update investigations, and periodic reinvestigations on applicants for, or employees in, competitive service positions must be conducted in accordance with National Security Directive 63. Each investigator conducting personnel security and suitability investigations, must themselves be investigated and must have a favorably adjudicated Single Scope Background Investigation (SSBI) that meets the OPM requirements of that investigation, as implemented by Executive Order 12968, preceding their performing under this delegation. ATF must certify that each investigator performing under the MOU is screened by an investigation that meets no less than OPM's current SSBI Critical-Sensitive investigative requirements. Contract investigators are required to meet the same level of background screening and rescreening as Federal Employees. In accordance with the MOU, ATF must implement an "Investigator Integrity follow-up Program" to ensure that contract investigators are conducting investigations in accordance with the minimum standards articulated in National Security Directive 63. Further, ATF must ensure that contract investigators, while performing their investigative duties, conduct themselves in such a manner as to bring credit to the United States government.

With this form revision, the following has been added/changed/deleted to assist the general public in responding to the questions, facilitate ATF's ability to more quickly determine the efficiency of the contract investigators, and assist ATF in quality control of its background investigations program:

- The interviewee's name, date of interview, and subject's name were added to the header of the form. This allows the interviewee to immediately see that the form relates to him/her and assists ATF when compiling the completed responses.
- An instructions block has been added to provide the interviewee with guidance on responding to the questionnaire and returning it to ATF in an enclosed envelope.
- Question #2 was added to determine if the contract investigator scheduled the appointment in advance which frequently results in reduced investigative expenses.
- Question #12 was added to determine if the contract investigator efficiently gathered all required information during the interview, avoiding an additional burden to the interviewee by being re-contacted. It should be noted that Question #12 of the December 2007 version of the form was removed as it was general in nature and the specific information needed was addressed in the previous questions.
- Other questions contain minor adjustments for clarity and were renumbered to assist with the flow of the questionnaire. In addition, space was provided for explanations to questions (when applicable).
- The request for the interviewee's name and address was removed from the bottom of the form since the name is documented on the header of the revised form and the address is known as the questionnaire was mailed to the interviewee.

2. ATF Personnel Security program managers; or their designees, will, on a random basis, solicit information, via the attached questionnaire, from persons who have been interviewed by contract investigators. The interviewee will be provided a self-addressed postage-paid envelope for his or her use in responding to the questionnaire. The questionnaire responses will be used to verify that contract investigators are actually interviewing the individuals that they have documented in their reports of investigation and are following prescribed policies while conducting the interviews. Areas reviewed relating to policy requirements include scheduling an appointment in advance, advising of Privacy Act rights, properly identifying him/herself, properly conducting and documenting the interview, and displaying a professional demeanor and appearance while conducting the interview.
3. ATF F 8620.7 is available on the ATF website as a fillable form. Individuals with disabilities (508 Compliant) can access this form. Currently, ATF does not have the capability to accept electronic submissions. For this submission, the respondent sends the completed form back to ATF via a postage paid return envelope.
4. Similar information is not available for this information collection requirement. ATF uses a uniform subject classification system to identify duplication and to ensure that any similar information already available cannot be used or modified for use for the purpose of this information collection. Internal controls will be established to ensure that the same respondent is not repeatedly asked to provide information with respect to different investigations.
5. There is no impact on small business or other small entities.
6. ATF utilizes the services of contract investigators to conduct security/suitability investigations on prospective or current employees, as well as those contractors and consultants doing business with ATF. The use of contract investigators permits ATF to use their permanent on-board investigative resources to combat crime and collect Federal revenues, rather than having to divert those resources to conducting personnel security/suitability investigations. This information collection is being conducted in order to ensure that the personnel security/suitability investigations are (1) conducted in such a manner as to meet the minimum standards of National Security Directive 63, and (2) conducted in such a professional manner as to reflect favorably upon the United States.
7. As submission of the information being sought is entirely voluntary on the part of the respondent, there are no circumstances that would cause the information collection to be conducted in any manner:
 - Requiring respondents to report information to ATF more than quarterly;
 - Requiring respondents to prepare a written response in fewer than 30 days after receipt of the questionnaire;
 - Requiring respondents to submit more than an original of any document;
 - Requiring respondents to retain any records;
 - Requiring the use of any statistical data;
 - Requiring any pledge of confidentiality; or
 - Requiring respondents to submit any proprietary or trade secrets.
8. Representatives from OPM were consulted during the creation of this information collection. A 60-day and 30-day Federal Register notice was published in order to solicit comments from the public. No comments were received.

9. No payment or gift is associated with this information collection. ATF will not provide any monetary incentive, gift, gratuity, or other remuneration to any respondent(s).

10. Confidentiality is not assured.

11. Questions of a sensitive nature are not asked of the respondent. However, questions concerning the behavior and degree of professionalism of the contract investigators are asked.

12. There are 2,500 respondents associated with this information collection. Each respondent will respond one time. The total number of responses is 2,500. It is estimated that it takes 5 minutes to complete the form. The total burden for this information collection is 208 hours.

At this time, it is not anticipated that there will be an increase in the burden hours for completion of the revised form. Both old and new versions of the form have approximately the same number of questions and both forms request additional information (when applicable) in seven of the questions.

13. There is no annual startup costs or annualized costs to the respondents.

14. The cost to the Federal Government is estimated at \$1,200.00 ATF does not anticipate increasing existing staffing to monitor this program, nor does it anticipate any additional equipment or supplies to administer this program.

15. There are no program changes or adjustments associated with this information collection.

16. The information collected will not be published.

17. ATF is not seeking OMB approval to not display the OMB expiration date.

18. There are no exceptions to the Certification Statement.

B. COLLECTION OF INFORMATION EMPLOYING STATISTICAL METHODS

ATF does not intend to employ statistical methodology in this information collection activity.