

Request for One-VA Identification Card

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

Homeland Security Presidential Directive (HSPD) 12, Policy for a Common Identification Standard for Federal Employees and Contractors mandates a government-wide standard for secure and reliable forms of identification issued by the Federal Government to its employees and contractors. The National Institute of Standards and Technology (NIST) released Federal Information Processing Standard (FIPS) 201, Personal Identity Verification (PIV) of Federal Employees and Contractors to identify the government-wide requirements for common identification cards, also known as PIV Cards, issued to Federal employees, contractors, and affiliates. FIPS 201 mandates PIV Cards must be personalized with information of the individual to whom the card is issued. The VA PIV Enrollment System Portal will be use to collect information required to personalize, print, and issue a PIV Card.

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 system.

Sponsors must complete the Sponsor section of the VA PIV Enrollment System Portal to start the PIV Card issuance/re-issuance process and to ultimately issue a PIV Card. It is estimated the average employee will require PIV Card re-issuance every three years. Contractors and affiliates need for PIV Card re-issuance will also depend on the length of the contract or length of service with VA. The collected information is required for issuance of the PIV card. These roles are clearly defined by VA policy and a training program has been established to ensure standard protocols are followed.

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.

Sponsors for employees, contractors, and affiliates will complete registration through the VA PIV Enrollment System Portal workflow process. The Sponsors will be presented with sets of data fields that will capture data relevant to organizational affiliation and identity, as required by FIPS 201. Information is collected in the electronic PIV Enrollment System by various workflow participants who are divided into specific, and FIPS 201 required, roles. The information from the electronic form is processed through an Identify and Access Management component to validate its authenticity and validity. A

subset of the personal information is provide to a Shared Service Provider for the generation of PKI certificates and a Government Smart Card Interoperability Specification (GSCIS) compliant smart card device that has been personalized for the applicant (e.g., employee, contractor, affiliate). This new service reduces the paper burden upon the public by adjusting the process from a primarily paper based transaction to an almost completely paperless one.

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.

The data collection requirement was modified to collect PIV Card personalization data directly into the VA PIV Enrollment System without use of a paper form (Form 0711). The changes do not require duplication of data collection.

5. If the collection of information impacts small businesses or other small entities (Item 5 of OMB Form 83-I), describe any methods used to minimize burden.

The collection of information does not impact on 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.

The Department of Veterans Affairs PIV Cards will not be compliant with HSPD-12 and FIPS 201 requirements if the data is not collected.

7. Explain any special circumstances that would cause an information collection to be conducted in a manner inconsistent with guidelines identified in Section A Question 7 of OMB 83-I:

There are no special circumstances associated with this data collection.

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

The Department notice was published in the Federal Register on, April 6, 2012, page 20889. There were no comments received.

9. Explain any decision to provide any payment or gift to respondents,

other than remuneration of contractors or grantees.

No payment or gift is provided to respondents.

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

Strict procedures will be followed for protecting the confidentiality of information gathered. Information collected becomes part of the PIV Card request record, which complies with the Privacy Act of 1974. The records are part of two Privacy Act System of record notice. They are 146VA005Q3 "Department of Veterans Affairs Identity Management System (VAIDMS)"; and 145VA005Q3 "Department of Veterans Affairs Personnel Security File System (VAPSFS)" and VA Office of Security and Law Enforcement system of records "Police and Security Records-VA (103VA07B).

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.

Questions of a sensitive nature are not required for this data collection.

12. Provide estimates of the hour burden of the collection of information.

It is estimated that Veterans Affairs will issue approximately 100,000 PIV Cards each year. The respondent burden is 5 minutes. This equates to a total of 500,000 minutes or 8,333 hours each year.

13. Provide an estimate for the total annual cost burden to respondents or record keepers resulting from the collection of information. (Do not include the cost of any hour burden shown in Items 12 and 14).

There is not a respondent or record keeper cost burden associated with annual reporting or record keeping of this data collection.

14. Provide estimates of annualized costs to the Federal government.

The average national VA salary in 2009 is \$59,858 which equates to approximately \$28.77 per hour. The collection of data estimated annual burden is 8,333 hours. This annual cost burden is estimated to be \$239,806.

15. Explain the reasons for any program changes or adjustments reported in Items 13 or 14 of the OMB Form 83-I.

There were no program changes.

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.

There are no plans to publish the results of the information collected.

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

This collection is submitted to OMB every three years. VA is seeking approval to omit the expiration date because it expects that this form will be used indefinitely without change. VA does not use the current paper form (0711), given the utility of the electronic version of the form (fully automated in the VA PIV Enrollment System Portal). Finally, it is significantly burdensome for the agency to change the date on the electronic form periodically.

18. Explain each exception to the certification statement identified in item 19, "Certification for Paperwork Reduction Act Submissions," of OMB Form 83-I.

This submission does not contain any exceptions to the certification statement.

B. Collection of Information Employing Statistical Methods.

Statistical survey methodology is not applicable to this data collection.