

JUSTIFICATION FOR NO MATERIAL NON-SUBSTANTIVE CHANGE TO A CURRENTLY APPROVED COLLECTION 3206-0005

The SF 86 collection is primarily done in the web-based e-QIP system. For rare circumstances when submitters are unable to utilize e-QIP, in the past, OPM Federal Investigative Services (FIS) has processed the hard-copy submissions of paper SF 86's using OPM FIS data entry staff to enter the information into the OPM electronic system.

Going forward, for the rare circumstances when hard copy forms are used, instead of OPM FIS data entry staff transcribing hard copy applicant data into the OPM system, authorized e-QIP users at the agencies will enter the information from the hardcopy SF 86 into e-QIP. This will allow agencies to use automation to validate the data prior to submission to OPM and improve investigative case processing timeliness.

This request for a no material, non-substantive change for this collection entails the addition of a certification block that would be checked by the e-QIP user at each participating agency when transcribing the hardcopy SF86 to OPM as a third-party preparer.

The authorized e-QIP user would check a box that includes acknowledgement of the instructions previously provided on the questionnaire and the process for submitting the SF 86. This is the proposed language for the certification block:

By selecting here, I understand all questions on this form must be answered **completely and truthfully** in order that the Government may make proper determinations on a complete record. I understand that if I withhold, misrepresent, or falsify information on this form, I am subject to the penalties for inaccurate or false statement (per U.S. Criminal Code, Title 18, section 1001) The U.S. Criminal Code (title 18, section 1001) provides that knowingly falsifying or concealing a material fact is a felony which may result in fines and/or up to **five (5)** years imprisonment. I certify that I am providing all information as provided to me by the applicant. I have not removed from or added to any information without consultation and approval from the applicant.

Also, I understand I must provide the Archival Copy of the completed application to the applicant for their review and for their record. I understand I am required to manually print or electronically save and provide a complete archival copy to the applicant to review for accuracy, sign all appropriate Signature Pages for the application that was generated, and return them to allow for processing.

I understand all signature pages that accompany this application are "e-QIP generated" and are in direct correlation with this specific request. All necessary information must be provided on the Certification Page to include the Data Hash Code, e-QIP Request Number, Date of Certification, Applicant Social Security Number, and necessary Personal Identifiers and applicant signature. Each additional document must contain the e-QIP Request Number and necessary Personal Identifiers and applicant signature.