

**SUPPORTING STATEMENT FOR THE
QUESTIONNAIRE FOR NATIONAL SECURITY POSITIONS, STANDARD
FORM 86 (SF86)
OMB #3206-0005**

Justification:

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

The information collected on this form is used to determine acceptability for Federal and Federal contract employment. The U.S. Office of Personnel Management (OPM) is authorized to request this information under Executive Orders 10450, 10577, 13467, as amended, and 13478; sections 3301, 3302, and 9101 of title 5, United States Code (U.S.C.); and parts 2, 5, 731, and 736 of title 5, Code of Federal Regulations (CFR), and Federal information processing standards. Section 1104 of title 5 allows OPM to delegate personnel management functions to other Federal agencies.

- 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.**

The Questionnaire for National Security Positions, SF 86 is housed in a system named e-QIP (Electronic Questionnaires for Investigative Processing) and is an information collection completed by applicants for, or incumbents of, Federal Government civilian or military positions, or positions in private entities performing work for the Federal Government under contract. The collection is used as the basis of information by the Federal Government in conducting background investigations, reinvestigations, and continuous evaluation, as appropriate, of persons under consideration for or retention in national security sensitive positions as defined in Executive Order 10450 and 5 CFR part 1400, and for positions requiring eligibility for access to classified information under Executive Order 12968. It is also used by agencies in determining whether a person performing work for or on behalf of the federal Government under a contract should be deemed eligible for logical or physical access when the nature of the work is sensitive and could bring about a material adverse effect on national security. The SF 86 is completed by civilian employees of the Federal Government, military personnel, and non-federal employees, including Federal contractors and individuals otherwise not directly employed by the Federal Government but who perform work for or on behalf of the Federal Government. For applicants for civilian Federal employment, the SF 86 is to be used only after a conditional offer of employment has been made.

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.**

The SF 86 is a standard form used for collecting subject data to be used in official background investigations conducted by the U.S. Government. e-QIP (Electronic Questionnaires for Investigations Processing) is a web-based system application that houses the SF 86. This electronic data collection tool provides immediate data validation to ensure accuracy of the respondent's personal information.

e-QIP automates the data collection process from the respondent, applies all required data editing rules to the respondent-supplied information, enforces data integrity, and provides sponsoring agencies an automated capability to review and approve each respondent's submission before releasing the data to an investigative services provider (ISP). e-QIP serves as a feeder system to other governmental systems, including ISPs and sponsoring agency personnel or security systems such as that at the State Department.

A respondent's complete and certified investigative data will remain secured in the e-QIP system until the next time the respondent is sponsored by an agency to complete a new investigative form. Upon initiation, the respondent's previously entered data (except 'yes/no' questions) will populate a new investigative request and the respondent will be allowed to update his or her information and certify the data. In this instance, time to complete the form is reduced significantly.

The electronic application includes branching questions and instructions which provide for a tailored collection from the respondent based on varying factors in the respondent's personal history. The burden on the respondent is reduced when the respondent's personal history is not relevant to a particular question, since the question branches, or expands for additional details, only for those persons who have pertinent information to provide regarding that line of questioning. Accordingly, the burden on the respondent will vary depending upon how the information collected relates to the respondent's personal history.

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.**

Information collected on the SF 86 is specific to the individual and thus not readily available from other sources, thus minimizing the likelihood of duplication.

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.**

Not applicable. This collection of information does not affect 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.**

The SF 86 is used to initiate background investigations required by E.O. 10450, 12968 and 13467, as amended; sections 3301, 3302, and 9101 of title 5, U.S.C.; parts 2, 5, 731, and 736 of title 5, CFR, and Federal information processing standards. The collection is used as the basis of information by the Federal Government in conducting background investigations, reinvestigations, and continuous evaluation, as appropriate, of persons under consideration for or retention in national security sensitive positions as defined in Executive Order 10450 and 5 CFR part 1400, and for positions requiring eligibility for access to classified information under Executive Order 12968. It is also used by agencies in determining whether a person performing work for or on behalf of the federal Government under a contract should be deemed eligible for logical or physical access when the nature of the work is sensitive and could bring about a material adverse effect on national security. The information is necessary for investigating agencies to comply with Federal Investigative Standards for such background investigations. If the collection is not conducted, agencies cannot comply with E.O. 10450, 12968, and 13467, as amended. The collection cannot be made less frequently as it is the basis for initial background investigations and for reinvestigations whose periodicity is established by federal investigative standards.

7. **Explain any special circumstances that would cause an information collection to be conducted in a manner inconsistent with the guidelines in 5 CFR 1320.6.**

Not applicable. This information collection is in compliance with 5 CFR 1320.6.

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. 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 3 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.

The 60-day notice of the proposed information collection was published in the Federal Register on March 12, 2013 (Federal Register Notices / Volume 78, Number 48, page 15755-15756) as required by 5 CFR 1320, affording the public an opportunity to comment on the form. Comments were received from the Department of Energy-Idaho National Laboratory (DOE-INL), the Department of Veterans Affairs (VA), the United States Air Force (USAF), Health and Human Services (HHS-CMS), Department of Homeland Security-Immigration and Customs Enforcement (DHS-ICE), the Office of the Secretary of Defense (OSD-CPMS), Federal Aviation Administration (FAA), and commenters from the public and OPM. Five advocacy groups, the Bazelon Center for Mental Health Law, Mental Health America, Consortium of Citizens with Disabilities (CCD), Family Equality Council, and Department of Justice (DOJ) Pride, submitted comments.

The Office of Personnel Management Routine Uses section was updated consistent with the most recent Federal Register publication notice of a revised system of records.

Family Equality Council commented that OPM should add “legally recognized civil union/domestic partner” throughout the form where the word “spouse” is used. OPM accepted this recommendation and will include consistent language throughout the form to more accurately collect information regarding legally recognized relationships.

A commenter from the public recommended updating regulations cited under the “Authority to Request this Information” section and amend to show that EO 9397 was amended by EO 13478. This recommendation was accepted.

A commenter from the USAF recommended administrative edits explaining the use of “IO” for initial only, and “NMN” for no middle name. This recommendation was not accepted because current instructions in the electronic application provide explanations for each acronym.

Commenters from USAF also provided recommendations to remove “not applicable” for Social Security number in section 4 (SSN) and to remove the requirement to list three possible contact numbers as directed in section 7 (Your Contact Information). The recommendation for removal of “not applicable” for the Social Security Number was not accepted. Not all respondents completing the questionnaire possess Social Security numbers, and therefore inclusion of the “not applicable” option is appropriate. The recommendation to remove the requirement to list three possible contact numbers was accepted, in part. Having access to multiple telephone numbers improves the opportunity for investigators to contact applicants as necessary throughout the investigation process. Revised guidance will be provided in section 7

to clarify that only one telephone number is required, but the other two numbers will facilitate completion of the background investigation.

Recommendations from the public and an OPM commenter included changes to section 9 (Citizenship), section 17 (Marital Status), and section 18 (Relatives) regarding the collection of information in instances of derivative U.S citizenship, and changes to the branching questions to display supporting documentation options to match claimed citizenship status. The recommendations were accepted in order to improve the accuracy of responses in these areas.

Comments were received from HHS-CMS and USAF regarding information collected in section 11 (Residence). The HHS-CMS commenter recommended adding an option to include “other periods of activity” instead of entering addresses multiple times. The commenter from USAF recommended adding instructions to this section for applicants not to list the same person more than one time as a reference. These recommendations were not accepted. Branching logic in e-QIP assists in the reporting of multiple periods of activity at the same location. The recommendation to limit references identified in this section may cause additional burden on applicants in the event that they may have limited acquaintances/references to provide who can verify the period of residence.

Commenters from OPM submitted recommendations to collect additional information in two sections of the form to assist investigators in contacting required references. One recommendation is to collect landlord information for rental property reported in section 11 (Residence). The other recommendation is to collect the telephone number of former spouse(s) reported in section 17 (Marital Status). These comments were accepted. In addition, OPM intends to provide “I don’t know” as an option for these questions.

Commenters from USAF and OPM submitted recommendations to change the instructions provided in section 12 (Education). Recommendations included modifying the requirement to list all schools to include high school, clarifying instructions to list multiple degrees/diplomas, and rewording instructions to have the applicant provide “name of person who can verify/validate your attendance while at the school.” These recommendations were not accepted. The need to provide all educational activity is not supported by investigative standards associated with the use of the form and would result in applicants providing more information than necessary. Branching questions in e-QIP provide guidance for applicants to list multiple degrees/diplomas as appropriate. In regard to the need to provide additional guidance for listing educational references, instructions in the current form are sufficient as they indicate that applicants should “list a person who knew you at the school (instructor, student, etc.)”

A commenter from USAF recommended the elimination of the block in section 15 (Military History) for Service Number or the inclusion of more instructions regarding what information is to be reported in that block. OPM did not accept this

recommendation at this time but will take the comment under advisement and conduct future research to determine whether the Service Number could be eliminated without an adverse impact on the ability to collect military service records required by federal investigative standards.

Recommendations were received from USAF and OPM commenters to provide additional instructions for section 16 (People Who Know You Well). The recommendations were to add verbiage instructing applicants not to list references already used as a reference elsewhere, and to provide instructions that all references should be people with whom Subject has had social contact in the last 7 years. These recommendations were not accepted as current guidance already addresses both recommendations.

Commenters from USAF submitted recommendations regarding section 18 (Relatives). Recommendations included requests to limit the collection of information pertaining to deceased family members who were foreign nationals, to add step in-laws as relatives, and to provide clarifying guidance that children are to be listed no matter their age and regardless of whether they are living at home. These recommendations were not accepted. Current branching logic with the electronic form collects only limited information pertaining to deceased relatives. The relative list as shown in section 18 provides support for investigative coverage requirements. The list may not identify all relatives that applicants would like to list on the form. For this reason applicants are provided an additional comment field to list other relatives beyond the standard requirement.

Family Equality Council commented that asking applicants to list their mothers' maiden name is duplicative and unnecessary and recommends removal of the "mothers' maiden name" field in section 18 (Relatives). This comment was not accepted because the mother's maiden name is needed to conduct certain checks associated with the subject of the investigation. In addition, the reporting is not duplicative because there is an option to indicate that the name is the same as previously listed in this section.

A commenter from USAF questioned why foreign contacts related to official U.S Government business are not required to be reported, as shown in section 20B (Foreign Business, Professional Activities, and Foreign Government Contacts). This comment was not accepted because the requirement to collect contacts in relation to U.S government business may create duplication of reporting requirements by applicants in connection to work-related government travel. In addition, information regarding U.S government travel can be validated through other portions of the investigative process.

Several comments were received regarding proposed changes to section 21 (Psychological and Emotional Health). Revisions to section 21 are being made after a multi-year interagency review process organized by the Office of Management and Budget with extensive participation from the Department of Defense, the Office of

the Director of National Intelligence, the Office of the Vice President, the National Security Council, the Department of Health and Human Services, the Veterans Administration, and others. The interagency group benefited from the wide range of perspectives and expertise from Government and private mental health professionals, national security experts, members of the Armed Forces, and veteran services providers. The modifications are designed to more precisely target the collection to information that is most relevant to the decision about eligibility for a national security position or access to classified information and to reiterate the Federal government's support for mental health and critical role treatment can play in the management of those conditions. The Bazelon Center for Mental Health Law (BCMHL) , Mental Health America (MHA), and Consortium of Citizens with Disabilities (CCD) recommended that OPM eliminate language suggesting that mental health treatment is relevant to a person's eligibility for a security clearance and modify the inquiry about mental health conditions to inquire instead about concerning behaviors. This recommendation was not accepted; however, the changes to section 21 represent a shift in the collection from a focus on an applicant's past or current treatment to a focus on whether the individual has any conditions or behavior – treated or otherwise – that may affect eligibility. The revised preamble to the section explains that while most individuals with mental health conditions do not present security risks, there may be times when such a condition can affect a person's eligibility for a security clearance. The preamble further states that mental health treatment and counseling, in and of itself, is not a reason to revoke or deny eligibility for access to classified information or for holding a sensitive position and that seeking or receiving mental health care for personal wellness and recovery may contribute favorably to decisions about an individual's eligibility. BCMHL, MHA, and CCD recommended that OPM eliminate inquiry about failure to follow treatment advice related to a mental health condition. This recommendation was not accepted; however, OPM is limiting the collection of such information to respondents who have been diagnosed with only specific conditions, namely psychotic disorder, schizophrenia, schizoaffective disorder, delusional disorder, bipolar mood disorder, borderline personality disorder, or antisocial personality disorder. For respondents who have been diagnosed with one of these conditions, inquiry will be made about whether, in the last seven years, there have been any occasions when the respondent did not consult with a medical professional before altering or discontinuing, or failing to start a prescribed course of treatment. . The same commenters also recommended that OPM not include any language in question 21 suggesting that mental health treatment could be evidence of impaired judgment, reliability, or trustworthiness. The revision to section 21 is already consistent with the thrust of this comment, however. The revised question already states that seeking mental health counseling will not prevent the respondent from obtaining or retaining a national security position; and that seeking wellness and recovery may favorably impact eligibility.

A commenter from OSD-CPMS asked for a description of the specific changes expected for this question. The proposed revision to Section 21 will inquire whether a court or administrative agency has ever issued an order declaring the respondent

mentally incompetent, whether a court or administrative agency has ever ordered the respondent to consult with a mental health professional, whether the respondent has ever been hospitalized for a mental health condition, and whether the respondent has ever been diagnosed by a physician or other health professional with psychotic disorder, schizophrenia, schizoaffective disorder, delusional disorder, bipolar mood disorder, borderline personality disorder, or antisocial personality disorder. Respondents who answer affirmatively to the latter question are asked whether, in the last seven years, there have been any occasions when the respondents did not consult with a medical professional before altering or discontinuing, or failing to start a prescribed course of treatment for any of the listed diagnoses. Respondents who answer “no” to each of the previous questions are asked whether they have a mental health or other health condition that substantially adversely affects their judgment, reliability, or trustworthiness even if not presently experiencing such symptoms. These questions are necessary to satisfy the adjudicative guidelines that apply to determinations of eligibility for access to classified information or to occupy a sensitive position.

Regarding section 22 (Police Record), a commenter from FAA recommended changing language found in the “have you ever” questions to specifically require the applicant to include all arrests. The commenter claimed that the phrasing of certain questions involving Section 22 leaves room for interpretation. The comment was not accepted because the change suggested is overly broad and would require the applicant to provide information outside of the investigative requirements.

A commenter from DHS recommended that the clarifying language proposed for Section 23 (Illegal Use of Drugs) is best served in the general instructions for the form. This comment was not accepted as the proposed clarifying instruction at the section is sufficient to inform applicants of the requirement to list illegal drug use consistent with Federal laws.

Comments were received from DOE-INL, HHS-CMS, OPM, and the public related to the functionality of the e-QIP application. The recommendations were not accepted because the comments do not pertain to content of the questionnaire but focus on the application. Recommendations included the need to provide additional support for the “agency reviewer” role in e-QIP, the rejection process, receipt of error messages, the ability to print a compact version of the questionnaire, support for digitally signing signature release forms, the ability to save partial data, and expanding characters used in certain fields. The recommendations were referred to the appropriate OPM personnel who have responsibility for the functionality of the e-QIP application.

A commenter with the USAF questioned the requirement for the respondent to provide information regarding a spouse or cohabitant without that person’s written consent. OPM did not accept this comment. Information collected for the spouse/cohabitant is necessary to fulfill requirements for the level of background investigation

requested on the respondent, which may include a spouse/cohabitant national agency check. Because the spouse/cohabitant is neither the subject of the investigation nor the subject of the resulting report of investigation, his or her written consent is not required by the Privacy Act or by 5 U.S.C. 9101.

A commenter with USAF requested publication of a policy that strictly prohibits the use of the SF 86 applications and information for any purposes outside of the official security clearance process. In response, OPM notes that written guidance is provided under the following sections of the instructional portion of the form: Purpose of the Form, Disclosure Information, and Privacy Act Routine Uses. The collection, maintenance, and disclosure of background investigative information are governed by the Privacy Act. Disclosure is also controlled under 5 CFR part 736 and E.O. 10450.

OPM added clarifying language to the “Authorization for Release of Information” to specify that information collected during the background investigation may include publicly available social media information. OPM also added an explanation that publicly available social media information includes any electronic social media information that has been published or broadcast for public consumption, is available on request to the public, is accessible on-line to the public, is available to the public by subscription or purchase, or is otherwise lawfully accessible to the public. The respondent is further advised that consent provided through the authorization does not require the respondent to provide passwords; log into a private account; or take any action that would disclose non-publicly available social media information.

OPM amended the “Authorization for Release of Information” to include the addition of other entities (Department of Homeland Security and the Office of the Director of National Intelligence) that are authorized to request criminal record information from criminal justice agencies for the purpose of determining the respondent’s eligibility for assignment to, or retention in, a national security position. This change is in accordance with the recent amendment to 5 U.S.C. 9101.

OPM added language to the “Authorization for Release of Medical Information Pursuant to the Health Insurance Portability and Accountability Act” to provide explanatory information as to the need for information about respondents’ mental health conditions, in certain circumstances, to assist in assessing eligibility for a security clearance. The release was also amended to inform the respondent that 1) should the respondent seek to revoke the authorization, the respondent should write to the respondent’s health care provider or entity, and 2) revocation of the authorization would not be effective until received by the respondent’s health care provider or entity.

OPM amended the “Fair Credit Reporting Disclosure and Authorization” to provide clarifying language that the authorization can be used to obtain information from one or more consumer reporting agencies in connection with a background investigation, reinvestigation, or ongoing evaluation (i.e. continuous evaluation) of eligibility for access to classified information or to hold a national security sensitive position. The

release was also amended to provide additional information regarding the impact of a security freeze on the respondent's consumer or credit report file on the investigation process. Information regarding the need for the respondent's Social Security number was removed as the information was duplicative of information already provided in the SF 86 instructions. Information was added to the authorization to explain that, like other authorization forms in the SF 86, the authorization is valid so long as the respondent occupies a national security sensitive position or requires eligibility for access to classified information.

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

Not applicable.

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

The SF 86 includes a Privacy Act Information statement. The statement indicates that the forms are in full compliance with 5 U.S.C. 552a (the Privacy Act of 1974) and other laws protecting the rights of the respondent. Further, the forms note that the information provided by the respondent, including the identity of the respondent, may be disclosed to the respondent upon request.

A person completing the forms is granted partial confidentiality under 5 U.S.C. 552a and 5 CFR 736. The forms contain an *Authorization for Release of Information and Fair Credit Reporting Disclosure and Authorization*, signed by the person completing the form and, if applicable, *the Authorization for Release of Medical Information Pursuant to the Health Insurance Portability and Accountability Act (HIPAA)*. The authorization forms request that record custodians and sources of information contacted during the investigation provide requested data concerning the person being investigated. Individuals completing the forms are informed that information obtained from record custodians and other sources is for "official use by the Federal Government" and can be disclosed only as authorized by law. Data reported on these forms is subject to exemptions from release under the Freedom of Information Act.

For additional information regarding Electronic Questionnaires for Investigating Processing Privacy Impact Assessment and notification of OPMs' revised system of records, please access the links provided below.

<https://www.opm.gov/information-management/privacy-policy/privacy-policy/eqip.pdf>

<https://www.gpo.gov/fdsys/pkg/FR-2016-10-11/html/2016-24507.htm>

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.

The SF 86 is an investigative tool. The form is designed to collect information appropriate for determining whether an individual is eligible for access to classified information; eligible for employment in sensitive position where the occupant could have a material adverse effect on the national security; suitable or fit based on character and conduct for employment or retention in a national security position in the Federal service; or fit based on character and conduct, or eligible for physical and logical access to federally controlled facilities or information systems, as a contract employee, when the duties to be performed are equivalent to the duties performed by an employee in a national security position.

The form obtains data from individuals with which to initiate an investigation to meet the adjudicative requirements established by presidential directive for access to classified information; by agency heads for eligibility to perform national security position duties or for fitness for employment in the excepted service or under contract; and by the Director of OPM for suitability or for eligibility for an identity credential. The questions represent an effort to obtain as much relevant and required information as possible directly from the person to be investigated, in accordance with provisions of the Privacy Act.

Questions on the SF 86 that may be considered sensitive in nature are listed and explained below:

- Section 21 (Psychological and Emotional Health): Inquiry as to whether a court or administrative agency has ever issued an order declaring the respondent mentally incompetent, whether a court or administrative agency has ever ordered the respondent to consult with a mental health professional, whether the respondent has ever been hospitalized for a mental health condition, and whether the respondent has ever been diagnosed by a physician or other health professional with psychotic disorder, schizophrenia, schizoaffective disorder, delusional disorder, bipolar mood disorder, borderline personality disorder, or antisocial personality disorder. A respondent who answer affirmatively to the latter question is asked whether, in the last seven years, there have been any occasions when the respondent did not consult with a medical professional before altering or discontinuing, or failing to start a prescribed course of treatment for any of the listed diagnoses. A respondents who answers "no" to each of the previous questions is asked whether the respondent has a mental health or other health condition that substantially adversely affects his or her judgment, reliability, or trustworthiness even if he or she is not experiencing such symptoms today. These questions are necessary to satisfy the adjudicative guidelines that apply to determinations of eligibility for access to classified information or to occupy a sensitive position.

- Section 22 (Police Record): Inquiry into criminal history, including details regarding criminal conduct, arrests, and convictions is appropriate for national security positions and so that an adjudicative decision regarding suitability or fitness for the position may be made. This information is also necessary to make accurate and complete checks of investigative files.

- Section 23 (Illegal Use of Drugs or Drug Activity): Inquiry into illegal drug use is appropriate for national security positions and so that an adjudicative decision regarding suitability or fitness for the position may be made.

- Section 24 (Use of Alcohol): Inquiries into use of alcohol is appropriate for national security positions and so that an adjudicative decision regarding suitability or fitness for the position may be made.

- Section 26 (Financial Record): Inquiry into personal finances is appropriate for national security positions and so that an adjudicative decision regarding suitability or fitness for the position may be made. It provides information used to determine trustworthiness, reliability, and honesty.

- Section 29 (Association Record): Inquiry into detailed information pertinent to a respondent's involvement in terrorist organizations, association with persons involved in activities to further terrorism and/or to overthrow the U.S. Government by force or violence is appropriate for national security positions and so that an adjudicative decision regarding suitability or fitness for the position may be made.

The instructions on the SF 86 inform the respondent of the reason that the information is requested, the authority for requesting it, how it will be used, and to whom it may be disclosed. They describe the investigative process and inform the respondent that OPM or the Federal agency requesting the investigation will make the final determination.

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

It is estimated that 263,566 non-federal individuals will complete the SF 86 annually for investigations conducted by OPM. The SF 86 takes approximately 150 minutes to complete. The estimated annual burden is 658,915 hours for OPM investigations. The electronic application includes branching questions and instructions which provide for a tailored collection from the respondent based on varying factors in the respondent's personal history. The burden on the respondent will vary depending on whether the information collection relates to the respondent's personal history.

	<u>Number of Respondents</u>	<u>Burden Hours</u>
SF 86	263,566	658,915

This form has been approved as a standard form. All Federal agencies using the form

not in connection with an OPM investigation may request the use of this common form without additional 60 or 30 day notice and comment requirements. Each agency will account for its number of respondents and the burden associated with the agency's use. Note that OPM makes the form available on the e-QIP system for agencies that conduct their own investigations.

13. Provide an estimate for the total annual cost burden to respondents or record keepers resulting from the collection of information.

There is no cost to individual respondents.

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 expenses that would not have been incurred without the paperwork burden.

e-QIP is an established web-based system which houses the revised SF 86. Since e-QIP is used to collect this information from both federal and non-federal respondents, there is no additional cost associated with revisions to these collections based solely on non-federal respondents.

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

No changes were made.

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.

Not applicable. Information collected on the forms will not be published.

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.

Not applicable.

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

Not applicable.