

**SUPPORTING STATEMENT
(0704-0461)**

“Qualification to Possess Firearms or Ammunition”

A. Justification

1. Need for Information Collection

In accordance with DoD Instruction 3020.50, “Private Security Contractors (PSCs) Operating in Contingency Operations, Combat Operations or Other Significant Military Operations” and 32 CFR Part 159, written acknowledgement by the contract company and its individual Private Security Contractor (PSC) personnel, after investigation of background of PSC personnel by the contractor, shall be provided verifying such personnel are not prohibited under U.S. law (18 USC 922(g)) to possess firearms or ammunition.

2. Use of the Information

Written acknowledgements shall be used to verify that PSC personnel are not prohibited from possessing firearms or ammunition.

In the case of individuals found to have a qualifying conviction, the appropriate authority will immediately retrieve all government-issued firearms and ammunition. It will be requested that such individuals be removed from contracts supporting contingency operations.

3. Information Technology

The use of information technology is not considered appropriate for the purposes of this collection. PSC personnel must sign the acknowledgement. In addition, the information collected during the verification process is maintained by the contract company and not by the Agency.

4. Efforts to Identify Duplication

There is no duplication of data collection. This is the first time contractor data is collected for these specific purposes.

5. Methods to Minimize Burden on Small Entities

The information collection associated with small businesses is the minimum consistent with applicable laws, Executive orders, regulations, and prudent business practices.

6. Consequences of Not Collecting the Data

If this data is not collected, Agencies will not be able to accurately verify whether or not PSC personnel are prohibited under U.S. law to possess firearms or ammunition.

7. Special Circumstances

There are no special circumstances that require the collection to be conducted in a manner inconsistent with the guidelines in 5 CFR 1320.5 (d) (2).

8. Agency 60-Day Federal Register Notice and Consultations Outside the Agency

Public comments were solicited in the Federal Register on March 27, 2013 as required by 5 CFR 1320.8(d). There were no comments received on the information collection.

9. Payments to Respondents

No payment or gift will be provided to respondents, other than remuneration of contractors under their contracts.

10. Assurance of Confidentiality

The information collected will be disclosed only to the extent consistent with prudent business practice, current regulations, and statutory requirements. No assurance of confidentiality is provided to respondents.

11. Sensitive Questions

Questions of a sensitive nature such as sexual behavior and attitudes, religious beliefs, and other matters that are commonly considered private are not asked in this collection.

12. Estimates of Response Burden and Annual Cost to Respondent

(a) Estimated Average Annual Respondent Burden:

- (1) Responses per Respondent: 25-1,500 employees (average of 300)
- (2) Number of Respondents: 50 companies
- (3) Hours per Response: 15 minutes
- (4) Total Annual Burden Hours: 3,750 (15,000 employees x .25 hrs)

A private security company is required to verify that its employees who are operating in either contingency operations (for DoD) or in a designated area of combat operations (for DoS and other federal agencies) are not prohibited under U.S. law (title 18, United States Code 922(g)) to possess firearms or ammunition. Based on current numbers of DoD and DoS armed private security contractors in Iraq and Afghanistan and the anticipated drawdown of forces, we estimate that there could be a requirement for 50 companies to complete this action for up to 15,000 individuals per year for the foreseeable future.

(b) Respondent Cost

Total Annual Cost to Respondents: \$148,500 (15,000 x \$9.90)

The cost to respondent is based on the approximate HR salary of \$40.00 (rate per hour)/60 (minutes) = \$.66 per minute. \$9.90 for a 15 minute response.

13. Estimates of Cost Burden for Collection of Information

DoD does not estimate any annual cost burden apart from the hour burden in Item 12, above.

14. Annual Cost to Government:

10 minutes for the contracting officer to verify information
15,000 total records x 10 minutes = 150,000 minutes
150,000 / 60 = 2,500 hours

Average Grade/Rank of contracting officer is GS-13 Step 1

Average Grade/Rank	Average Salary/hr (DC area FY11)	Total Annual Hours	Total Annual Cost
GS-13 Step 1	\$42.80	2,500	\$ 107,000 = (\$42.80 X 2,500)

Total Cost to the Government: \$107,000.00

15. Changes in Burden

While the requirement for the total number of records remains the same, the number of companies responding has been reduced to reflect current and expected operational experience. There was a slight increase in the cost due to an increase in the average salary per hour for an individual respondent and a contracting officer.

16. Plan for Tabulation or Publication

The information collected will not be tabulated or published.

17. Approval to Avoid Display of the Expiration Date of OMB Approval.

Approval is not sought for avoiding display of the expiration date for OMB approval of the information collection.

18. Exception to Certification Statement

There are no exceptions to the certification accompanying this Paperwork Reduction Act submission.

B. Collection of Information Employing Statistical Methods.

Statistical methods will not be employed.