

## Supporting Statement Outline – Sample

### **NOTE: Complete Part A for all ICR Requests**

#### SUPPORTING STATEMENT – PART A

##### A. JUSTIFICATION

###### 1. Need for the Information Collection

NGA needs to collect the information for administrative purposes, such as time and attendance audits, training statistics, etc. In addition to needing the information for administrative purposes as outlined above, NGA is also a member of the Intelligence Community as outlined in DoDD 5105.60 *National Geospatial-Intelligence Agency* and is “subject to the oversight of the DNI”. NGA is directed by Intelligence Community Standard (ICS) 700-2, *Use of Audit Data for Insider Threat Detection*, and Intelligence Community Directive (ICD) 700 *Protection of National Intelligence* to protect agency assets, including its personnel. To ensure compliance with the IC requirements, it is necessary for NGA to collect information, including personally identifiable information, about its personnel.

###### 2. Use of the Information

The information collection requirement is necessary to maintain and disseminate employee information to facilitate a variety of NGA’s mission-related duties, including activities related to administrative matters, account creation, operations support, access controls, workforce security, training records, expertise, competency management, polygraph information, drug, vision and medical test results, Federal reporting requirements, and domestic and international counterintelligence.

###### 3. Use of Information Technology

The information collection requires 100% electronic response via database entry by the individual and/or system administrators.

###### 4. Non-duplication

There are no other systems which collect this specific information that could be used in lieu of this collection.

###### 5. Burden on Small Business

No significant burden is placed on Small Businesses.

###### 6. Less Frequent Collection

The collection is an initial collection taken at the time the individual begins employment or assignment at NGA. It is updated as necessary depending on the individual's change in status, position, etc.

7. Paperwork Reduction Act Guidelines

The collection is consistent with the guidelines delineated in 5 CFR 1320.5(d)(2).

8. Consultation and Public Comments

The 60-day notice was published on May 24, 2013. No Comments were received.

9. Gifts or Payment

N/A

10. Confidentiality

Records in this system are safeguarded in accordance with applicable rules and policies, including all applicable NGA automated systems security and access policies. Strict controls have been imposed to minimize the risk of compromising the information that is being stored. Access to the computer system containing the records in this system is limited to those individuals who have a need to know the information for the performance of their official duties and who have appropriate clearances or permissions. Some of the technical controls include, limited, role based access as well as profiles based access to limit users to only data that is needed for the performance of their official duties. The system is located in a secure data center and operated by Federal personnel. In accordance with the records retention schedule approved by the National Archives and Records Administration (NARA), NGA will delete or destroy these records three years after the end date of employment with NGA.

The original SORN was published January 2010 and can be found at 75 FR 3899. NGA has revised and updated the system to more accurately reflect its current purpose. It was published in the Federal Register on May 24, 2013 and can be found at 78 FR 31526. The Privacy Impact Assessment (PIA) was conducted in November, 2011.

11. Sensitive Questions

This system does not collect data related to individuals' First Amendment rights. It does include individuals' SSN, which is limited to managing DFAS and clearance passage. NGA's Senior Component Official for Privacy has signed an SSN Justification Memo to accompany the System of Records Notice submitted to DoD Privacy Office explaining this need.

12. Respondent Burden, and its Labor Costs

a. Estimation of Respondent Burden

12,000 respondents with a burden per response equaling 30 minutes totals 6000 annual burden hours.

b. Labor Cost of Respondent Burden

Using the 2012 hourly rate for a GS-13 level employee provided by the Office of Personnel Management (\$38.92) multiplied by the annual burden hours (6000 hours), the annual labor cost to individuals is \$233,520.00.

13. Respondent Costs Other Than Burden Hour Costs

There is no start up or maintenance cost to respondents.

14. Cost to the Federal Government

Using the 2012 hourly rate for a GS-13 level employee provided by the Office of Personnel Management (\$38.92) multiplied by the annual burden hours for processing each entry (6000 hours), the annual labor cost to the Federal Government is \$233,520.00.

15. Reasons for Change in Burden

This is a new collection therefore, there is no change in burden.

16. Publication of Results

N/A. This collection not for statistical purposes or surveys and will only be published internally on a classified system. It is a repository of personal and professional information collected from individuals employed by and/or assigned to NGA.

17. Non-Display of OMB Expiration Date

N/A

18. Exceptions to "Certification for Paperwork Reduction Submissions"

N/A