

**SUPPORTING STATEMENT A
FOR PAPERWORK REDUCTION ACT STATEMENT SUBMISSION**

**UNITED STATES PARK POLICE PERSONAL HISTORY STATEMENT
OMB CONTROL NUMBER 1024-0245**

Terms of Clearance: None.

Justification

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

The United States Park Police (USPP) is a unit of the National Park Service, Department of the Interior, with jurisdiction in all National Park Service areas and certain other Federal and State lands. The USPP are highly trained, professional police officers who prevent and detect criminal activity; conduct investigations; apprehend individuals suspected of committing offenses against Federal, State, and local laws; provide protection to the President of the United States and visiting dignitaries; and provide protective services to some of the most recognizable monuments and memorials in the world.

Applicants for USPP officer positions must complete and pass a competitive written examination, an oral interview, a medical examination and psychological evaluation, and a battery of physical fitness and agility tests. As part of this application process, we (National Park Service) use USPP Form 1 (United States Park Police Personal History Statement) to collect detailed personal history information from applicants. Our authority to collect this information is derived from one or more of the following: Title 5, Code of Federal Regulations, section 5.2; Title 5, United States Code, sections 1302, 1304, and 3301; sections 8(b), 8(c), and 9(c) of Executive Order 10450; and Title 42, United States Code, section 2455.

- 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. Be specific. If this collection is a form or a questionnaire, every question needs to be justified.**

Applicants seeking employment as a USPP officer complete USPP Form 1 to provide information on their personal history. We have not made any substantive changes to the form, only minor edits to clarify instructions or improve readability. Investigators verify the information provided and use it to determine an applicant's suitability for a USPP officer position. If an applicant is hired, USPP Form 1 becomes part of the employee's security file. If an applicant is not hired, the form is kept secured and later destroyed in accordance with the Office of Personnel Management's disposal of documents requirements. We collect:

Personal Data.	Employment information
Selective Service information	Driving record
Military data	Arrest/conviction data
Financial data	Illegal drug usage
References	Alcohol usage
Residence data	Criminal history information

7. Explain any special circumstances that would cause an information collection to be conducted in a manner:
- * requiring respondents to report information to the agency more often than quarterly;
 - * requiring respondents to prepare a written response to a collection of information in fewer than 30 days after receipt of it;
 - * requiring respondents to submit more than an original and two copies of any document;
 - * requiring respondents to retain records, other than health, medical, government contract, grant-in-aid, or tax records, for more than three years;
 - * in connection with a statistical survey that is not designed to produce valid and reliable results that can be generalized to the universe of study;
 - * requiring the use of a statistical data classification that has not been reviewed and approved by OMB;
 - * that includes a pledge of confidentiality that is not supported by authority established in statute or regulation, that is not supported by disclosure and data security policies that are consistent with the pledge, or which unnecessarily impedes sharing of data with other agencies for compatible confidential use; or
 - * requiring respondents to submit proprietary trade secrets, or other confidential information, unless the agency can demonstrate that it has instituted procedures to protect the information's confidentiality to the extent permitted by law.

There are no circumstances that require us to collect the information in a manner inconsistent with OMB guidelines.

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 in response to the PRA statement associated with the collection over the past three years, 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 three 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.

On August 29, 2013, we published in the Federal Register (78 FR 53478) a notice of our intent to request that OMB renew this information collection. In that notice, we solicited comments for 60 days, ending on October 28, 2013. We did not receive any comments in response to that notice.

In addition to the Federal Register notice, we contacted the following former applicants to get feedback on how long it takes to complete USPP Form 1 and the necessity and clarity of the form:

Enjoli Tuitt 1100 Ohio Drive, SW Washington, DC 20242 202-426-6710	Heidi Nielsen 1100 Ohio Drive, SW Washington, DC 20242 202-426-6710
Matthew Cooney 1100 Ohio Drive, SW Washington, DC 20242 202-426-6710	Fallon Higgins 13292 Fieldstone Way Gainesville, VA 20155 (540) 219-5931
Luis Feliciano 1100 Ohio Drive, SW Washington, DC 20242 202-426-6710	Shannon Smoot 1100 Ohio Drive, SW Washington, DC 20242 202-426-6710
Ciben Edwards 4333 Taney Ave. #403 Alexandria, VA 22304 904-208-9949	Kathryn M. Hendrickson 1100 Ohio Drive, SW Washington, DC 20242 202-426-6710
James Laska 1100 Ohio Drive, SW Washington, DC 20242 202-426-6710	

All commenters agreed that the information was necessary and the questions were clear.

One commenter stated that a detailed resume and references would be as valuable as the form and more concise. This commenter also stated that the questions were repetitive and that time could be saved by eliminating duplicate questions. Two commenters stated that the requirement for recalling all addresses is a chore and that much of the information duplicates information required on OPM security clearance forms. One commenter stated that the questions were duplicitous, asking similar questions to get the same answer.

Two commenters said it would be helpful if the form were electronic.

Two commenters stated that it took 8 hours to complete the form, four indicated it took between 8 to 10 hours, one commenter stated 3 hours, and two commenters indicated 12 hours.

We believe that 8 hours is the average time it will take most respondents to complete the form.

We agree that an electronic form would be helpful; however, we do not have the infrastructure to support an all-electronic submission system at this time. We will continue to use the fillable .pdf version until such resources are available to develop and maintain an electronic system.

We note the statements regarding duplicate questions. The intention of the duplicate questioning is to ensure consistency throughout the applicant processing and to identify potential fraudulent activity by an applicant. We have not made any changes to the form based on these comments.

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

We do not provide any payments or gifts to respondents.

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

All forms are stored in compliance with OPM/Govt-5 (5 CFR 297) in secure areas in locked file cabinets and treated as confidential information. Only individuals with a need to use the information have access. The information collection complies with the Privacy Act of 1974 and OMB Circular A-130. Such information may be exempt from disclosure under the FOIA (5 U.S.C. 552).

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.

We ask questions of a personal nature essential to determining the suitability of an applicant for employment as a USPP officer; however, we do not ask sensitive questions such as those above.

12. Provide estimates of the hour burden of the collection of information. The statement should:

- * **Indicate the number of respondents, frequency of response, annual hour burden, and an explanation of how the burden was estimated. Unless directed to do so, agencies should not conduct special surveys to obtain information on which to base hour burden estimates. Consultation with a sample (fewer than 10) of potential respondents is desirable. If the hour burden on respondents is expected to vary widely because of differences in activity, size, or complexity, show the range of estimated hour burden, and explain the reasons for the variance. Generally, estimates should not include burden hours for customary and usual business practices.**
- * **If this request for approval covers more than one form, provide separate hour burden estimates for each form and aggregate the hour burdens.**
- * **Provide estimates of annualized cost to respondents for the hour burdens for collections of information, identifying and using appropriate wage rate categories. The cost of contracting out or paying outside parties for information collection activities should not be included here.**

We estimate that 3,000 to 5,000 individuals will apply annually for the position of a USPP officer. Of this total, approximately 2,500 applicants will pass initial screening tests and complete USPP Form 1. We estimate it will take 8 hours to complete the form, including time to gather information and read instructions.

We estimate the dollar value of the annual burden hours to be **\$603,200**. We used Bureau of Labor Statistics news release USDL 13-2349, Employer Costs for Employee Compensation—September 2013, to estimate average hourly wages and to calculate benefits. Table 1 lists the hourly rate for all workers as \$21.54. To calculate benefits, we multiplied the hourly rate by

1.4, resulting in an hourly cost factor of \$30.16.

REQUIREMENT	TOTAL ANNUAL RESPONSES	BURDEN HOURS PER RESPONSE	TOTAL ANNUAL BURDEN HOURS	HOURLY LABOR COSTS INCLUDING BENEFITS	TOTAL DOLLAR VALUE OF ANNUAL BURDEN HOURS
USPP Form 1	2,500	8	20,000	\$ 30.16	\$ 603,200

13. Provide an estimate of the total annual non-hour cost burden to respondents or recordkeepers resulting from the collection of information. (Do not include the cost of any hour burden already reflected in item 12.)

- * The cost estimate should be split into two components: (a) a total capital and start-up cost component (annualized over its expected useful life) and (b) a total operation and maintenance and purchase of services component. The estimates should take into account costs associated with generating, maintaining, and disclosing or providing the information (including filing fees paid for form processing). Include descriptions of methods used to estimate major cost factors including system and technology acquisition, expected useful life of capital equipment, the discount rate(s), and the time period over which costs will be incurred. Capital and start-up costs include, among other items, preparations for collecting information such as purchasing computers and software; monitoring, sampling, drilling and testing equipment; and record storage facilities.
- * If cost estimates are expected to vary widely, agencies should present ranges of cost burdens and explain the reasons for the variance. The cost of purchasing or contracting out information collection services should be a part of this cost burden estimate. In developing cost burden estimates, agencies may consult with a sample of respondents (fewer than 10), utilize the 60-day pre-OMB submission public comment process and use existing economic or regulatory impact analysis associated with the rulemaking containing the information collection, as appropriate.
- * Generally, estimates should not include purchases of equipment or services, or portions thereof, made: (1) prior to October 1, 1995, (2) to achieve regulatory compliance with requirements not associated with the information collection, (3) for reasons other than to provide information or keep records for the government, or (4) as part of customary and usual business or private practices.

The total nonhour annual cost burden is \$227,500. We estimate that the average cost per application is \$91.00 (rounded) as follows:

USPP-1 - \$15.85 per form. Although USPP Form 1 is available in a fillable format, applicants must print the form and have it notarized. We estimate the cost for printing each form is \$5.85 (65 pages @ \$0.09 per page) and the notarization fee for each form is approximately \$10.00, or a total of \$15.85.

Supporting Documents - \$75.00 per application. Applicants must supply a variety of supporting documents (see page 7 of USPP-1). The average nonhour burden cost to obtain, copy, or notarize/certify these documents will vary depending upon the number and type of documents required to support claims of education, driver's license history, tax history, marital history, military service, court information etc. We estimate the average cost for providing supporting documents to be \$75 per application, based on the following costs:

- Average retail price per page for copies = \$.09.
- Cost to obtain certified driving records = ~ \$15.00 per record.
- Cost of obtaining court records varies greatly. Some may be free, some may charge up to \$.10 per page.
- Cost to obtain other legal records will vary depending upon the type of record to be obtained, up to \$5.00 plus \$.10 per page
- Notary costs will vary, an average cost per notary stamp is about \$10.00.
- Education transcripts may cost up to \$20 per request.
- Copies of tax transcripts are usually free, but some States may charge a fee. Consumers are entitled to a free copy of a credit report annually.
- Military records should also be free to the current/former service member, although there may be unanticipated administrative costs.

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 expense that would not have been incurred without this collection of information.

We estimate the total annual cost to the Federal Government is \$24,560 (salary plus printing costs). Of the 2,500 applicants who complete USPP Form 1, approximately 2,000 will pass the physical examination. A panel of USPP officers, background investigators, and human resources specialists convene to review the forms to verify the information and screen for applicant suitability. The class, subclass, step, grade, and years of service of employees who work with this information collection vary. The panel meets for 2 days for an average of 13 hours each day (26 hours) to review the 2,000 forms.

SALARY COSTS - \$24,360 (rounded) (\$936.91 X 26 hours)

POSITION	HOURLY PAY RATE	HOURLY RATE WITH BENEFITS**	TOTAL HOURLY COST (hourly benefit rate X no. of employees)
*4 Sergeants 4/5 - 22	\$ 51.20	76.80	\$ 307.20
*3 Officers 1/1 - 4	\$ 40.48	60.72	\$ 182.16
**2 Background Investigators GS-12/step 5	\$ 40.86	61.29	\$ 122.58
*2 Detectives 3/4 - 15	\$ 47.03	70.55	\$ 141.10
**3 HR Specialists GS 9-11/step 5	\$ 40.86	61.29	\$ 183.87
Total			\$ 936.91

* Hourly rate based on the United States Park Police Law Enforcement Pay Equity Act of 2000, Washington, DC Locality Pay Table.

** To determine average hourly rates, we used Office of Personnel Management Salary Table 2013-CB. We multiplied hourly overtime rates by 1.5 to account for benefits, in accordance with USDL 13-2349.

PRINTING COSTS - \$200

USPP Form 1 is available in a fillable format; however, we will provide a hard copy to those who (1) do not have access to a computer or (2) for some other reason want to complete the hard copy version. We estimate this printing cost to be \$200.

15. Explain the reasons for any program changes or adjustments in hour or cost burden.

We are reporting 2,500 annual responses totaling 20,000 burden hours for this collection, which is an adjustment increase of 1,500 responses and 12,000 burden hours. We increased the number of responses based on our experience in administering this collection. We have also made an adjustment increase (from \$11,100 to \$227,500) for the nonhour burden costs. The increased cost is due to the increased number of responses as well as including costs for providing required supporting documents.

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.

We will not publish the results of this information collection.

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.

We will display the OMB control number and expiration date on USPP Form 1.

18. Explain each exception to the topics of the certification statement identified in "Certification for Paperwork Reduction Act Submissions."

There are no exceptions to the certification statement.