

## SUPPORTING STATEMENT – PART A

### A. JUSTIFICATION

#### 1. Need for the Information Collection

The Defense Information Systems Agency (DISA) is proposing to establish a new system of records to track/record employee records and security related information. The White House Communications Agency (WHCA) will collect Personally Identifiable Information (PII) to include, home address, home of record, civilian education level, gender, race, marital status, date of birth, social security number, automobile makes, models and licenses plates and previous work experience in order to establish Presidential Support Duty suitability or to visit the White House work areas. The authorities that mandate such collections are 5 U.S.C. 1303 Investigations; 5 U.S.C 3301, Civil service; 44 U.S.C. 3101; DoD Directive 5210.55; DoD Instruction 5210.87 and E.O. 9397 (SSN), as amended.

#### 2. Use of the Information

The collection will be used to make accessibility and hiring decisions; it will be used manage personnel and security records for the purpose of security clearance and suitability validation, analysis, and appraisal throughout the lifecycle. This system is used specifically to track travel, security, sensitive items such as access/accountable badges, ownership and employment data of White House Communications Agency (WHCA) employees for the White House community.

#### 3. Use of Information Technology

The information collection will utilize technological techniques. The database is populated based on the input received from individual electronic response submissions. By processing this data electronically, it will reduce the burden on the public instead of manually processing the collection.

#### 4. Non-duplication

Some of the subject data already exist in our BEAST database and will be utilized when available in order to prevent duplication. BEAST will come down and be replaced by DefenseReady when operational. WHCA/WHMO also uses a Security Form, WHCA Form 89 included as part of this submission, which augments the OPM security form, OPM SF 86, and so some of the questions are very similar to OPM's question. This is a tactical decision to identify potential deception during the Presidential Support Program (PSP) process by comparing the answers across the two forms.

#### 5. Burden on Small Business

N/A

6. Less Frequent Collection

The collection will only take place on an “as needed” basis. There is no timeline that requires that aforementioned data be collected on a recurring basis, (e.g., hourly, weekly, monthly, etc.)

7. Paperwork Reduction Act Guidelines

We will comply fully with 5 CFR 1320.5(d)(2) and have no plans of deviating from any federal statutes, rules or guidelines.

8. Consultation and Public Comments

a. The DefenseReady system was published in the Federal Register, Document Number - 2013-18991 on 08-07-2013; column #2 page 48150 for the Agency’s 60-day notice, in accordance with 5 CFR 1320.8(d), soliciting comments on the information collection prior to submission to OMB. There were no public comments received.

b. N/A

9. Gifts or Payment

N/A. No gifts or payments will be permitted regarding the collection of data.

10. Confidentiality

All personal and sensitive data collected will be protected in accordance with federal and DoD handling instructions/procedures. The data will be inside of a facility that guarded 24 hours a day, 365 days a year and is on a military installation. The server where the data resides is inside a Sensitive Compartmented Information Facility (SCIF). The Privacy Act System of Records Notice (SORN) ID number is KWHC-08 under DefenseReady and a Privacy Impact Assessment has been accomplished. The hard copy WHCA Form 89 is uploaded as a PDF into the DefenseReady data base. The hard copy is destroyed immediately after it is uploaded. Hard copies of the OPM Form 86 are maintained in the security office file cabinets for 30 days. These forms are immediately destroyed for the non-selected candidates and within 365 days (the probationary period) for those who have been selected for Presidential Support Duty.

11. Sensitive Questions

No questions of a sensitive nature, such as those pertaining to sexual behavior or attitudes, religious beliefs will be collected. Race, Photos, and SSN collection follow the guidelines of The Privacy Act, as implemented by DoD 5400.11-R. This data is required to accomplish our mission. Sensitive data will be collected, but will be treated/protected in accordance with all applicable federal regulations; to include DODI 5210.87 and the adjudicative standards contained in DoD 5200.2-R reference c, this ‘sensitive collection’ is required because individuals under consideration for Presidential support duties are subject to standards such as

high degree of maturity, discretion and trustworthiness. Persons assigned to or retained in Presidential support duties shall be the best suited and best qualified based on a determination that their assignment or retention is clearly consistent with optimum Presidential security and support. The SSN is collected as a means of a personal identifier and the following exemptions from DoD Instruction 1000-30 SSN Reduction Act are applicable: (2) Law Enforcement, National Security, and Credentialing and (3) Security Clearance Investigation or Verification. All individuals are advised of their rights under the Privacy Act Statement of 1974 and we assure the individual that their data will be protected and controlled accordingly. We will not collect data pertaining to religious beliefs or ethnicity.

12. Respondent Burden, and its Labor Costs

a. Estimation of Respondent Burden

The collection will bring in approximately 150 new respondents annually and it will take about 15 minutes for each respondent to provide the requested information for total of approximately 38 annual hours:  $150 * 15 / 60 = 38$  hours. 100% of this collection will occur electronically.

b. Labor Cost of Respondent Burden

\$950 annually; This number was derived by factoring labor cost (item B) based on US median income (\$52,000 annually) - derived from US Census ( $\$25$  per hour x 38 hours) = \$950

13. Respondent Costs Other than Burden Hour Costs

a. None

b. None

14. Cost to the Federal Government

\$10,200 annually; Factored Cost to Federal Government at average income for (E6/E7) who will be primary custodians inputting data at ( $\$17$  per hour x 600 hours)

15. Reasons for Change in Burden

We are implementing a new system.

16. Publication of Results

We will not publish this data.

17. Non-Display of OMB Expiration Date

We are not requesting omission of expiration date

18. Exceptions to "Certification for Paperwork Reduction Submissions"

We are not requesting exceptions to Paperwork Reduction submissions.