

SUPPORTING STATEMENT
PHYSICAL ACCESS CONTROL SYSTEM (PACS) - LENEL

A. Justification:

1. Need for the Information Collection

This is a request for OMB approval under the Paperwork Reduction Act for collection of personally identifiable information (PII) from civilian and military personnel of DLA, contractor employees, and other persons who require unescorted access to DLA-controlled installations and facilities. Authority to collect the information is provided by Executive Order 10450 and DoD Directive 5200.08.

2. Use of the Information

Information in this system (PACS - Lenel) is used by security professionals to properly vet those individuals requesting and requiring unescorted access to DLA-controlled installations and facilities. The information collection requirement is needed to obtain the necessary data to verify eligibility for a Department of Defense (DoD) physical access card for personnel who are not entitled to a Common Access Card or other approved DoD identification card. The information is used to establish eligibility for the physical access to the DLA Distribution San Joaquin, DLA Distribution Susquehanna, or DLA Land and Maritime installations or facilities.

3. Use of Information Technology

IT is not used in this information collection. Information is collected via paper form and stored in the system.

4. Non-Duplication

DLA has three other Access Systems which collect identical information from members of the public. However, this system is specific to this location, therefore retrieving information from different individuals than the other systems collect from.

5. Burden on Small Business

There is no impact on small businesses.

6. Consequences of Not Collecting

Directive-Type Memorandum 09-012, "Interim Policy Guidance for DoD Physical Access Control," requires all unescorted persons entering DoD installations have their identity proofed and vetted. Identity proofing and vetting prevents unauthorized personnel and nefarious characters from entering DLA-controlled installations and facilities, thus preventing the disruption and destruction of DLA's mission and resources. Failure to collect PII necessary for vetting unescorted persons will make DLA non-compliant with DoD policy.

7. Paperwork Reduction Act Guidelines

There are no special circumstances. This collection is consistent with 5 CFR 1320.5(d)(2).

8. Consultation and Public Comments

This information was published in the Federal Register on August 20, 2013 (78 FR 51173). There were no comments received from the public. The 30 day notice was published on March 17, 2014 (79 FR 14674).

9. Gifts or Payment

No payments or gift will be provided to the respondents.

10. Confidentiality

Confidentiality is covered by the Privacy Act. The System of Records Notice applicable to this collection is S500.50, Facility Access Control. The Privacy Act Statement appears on the forms (DSCC Form 2310-1, DSCC Form 2310-2, and DSCC Form 2313). The Privacy Impact Assessment for the DLA PACS (Lenel) can be accessed at: <http://www.dla.mil/InformationOperations/Pages/PIA.aspx>.

11. Sensitive Questions

These forms require DLA civilian and military personnel, contractor employees, and other persons to provide certain personal information, such as name, grade/rank, address, and SSN, to be used in the course of vetting the individual. SSNs are required to vet individuals against legacy authoritative databases that require SSNs as the method to validate the identity of the individual.

12. Estimates of Respondent Burden and Annual Costs

(a) Estimation of Respondent Burden

Type of Response	Estimated Number of Respondents per year	Estimated Number of Responses per Respondent	Average Burden Hours per Response	Estimated Total Annual Burden Hours Requested
Public	60,000	1	15 minutes	15,000 hours

(b) Labor Cost of Respondent Burden

The respondent's time calculated as follows (using data Office of Personnel Management General Schedule (GS) Annual Salary Table for 2013 for the "Washington DC metro area" and the number of work hours = 2087):

Average Burden Hours	Average cost per respondent (using median annual salary of GS-9 worker divided by the number of hours worked per year, rounded up) divided by 4 since it takes approximately 15 minutes to complete $(\$52,000/2087)/4$	Estimated Total Annual Cost Burden to Respondents $(\$6.23 \times 60,000)$
15 minutes	\$6.23	Total = \$373,800

13. Estimated Respondent Costs Other Than Burden Hour Costs

None.

14. Estimated Annual Cost to the Federal Government

Estimated Number of Requests per year	Average Processing Time per Request	Average cost GS-12 security employee to complete a request (median salary/number of hours worked per year) divided by 4 since it takes approx. 15 minutes to process a request $(\$75,000/2087)/4$	Estimated Total Annual Government Cost $(\$8.98 \times 60,000)$
60,000	15 minutes	\$8.98	\$538,800

15. Reasons to Change in Burden

This is a new collection being submitted for review.

16. Publication of Results

This information is not for publication.

17. Non-Display of OMB Expiration Date

This approval is not being sought.

18. Exceptions to "Certification for Paperwork Reduction Submissions"

No exceptions.

B. Collection of Information Employing Statistical Methods

Not applicable.