

SUPPORTING STATEMENT (Refer to OMB Form 83-I INST)

A. JUSTIFICATION

1. Need for the Information Collection

The Pentagon Force Protection Agency requires collection of information from members of the public during the course of investigating criminal or suspicious activity incidents and medical responses in order to positively identify respondents and collect information pertinent to the medical assistance and investigation and/or criminal prosecution of persons involved. This information can include an individual's Social Security Number (SSN) to differentiate him/her from another person with the same name and birthdate. PFPA is denoted a law enforcement agency under DODD 5105.68, section 4 "PFPA shall provide force protection, security, and law enforcement to safeguard personnel, facilities, infrastructure, and other resources for the Pentagon Reservation and for assigned DoD activities and DoD-occupied facilities within the National Capital Region (NCR)". The requirements for recording incident events and the use of a software-based records management system are described at length in the National Fire Protection Association (NFPA) Standard 1221-2013. The acceptable collection of SSN's by law enforcement agencies for interoperability with organizations beyond the Department of Defense or operational necessities are stated in DODI 1000.30, August 1, 2012.

2. Use of the Information

Responders will use this actionable information to make time-critical decisions and support operations and exchange of data across responder Directorates. The CAD/RMS is replacing the current ineffective and outdated ICIS tool to support public safety, law enforcement, and facility security and strengthen command and control operations by improving sharing of critical information. The CAD/RMS will be used to develop reports on groups and individuals that have harmed, or have attempted harm; made direct or indirect threats; have a specific interest in OSD High Risk Personnel, the DoD workforce, or the Pentagon Facilities; or have engaged in organized criminal activity such as gangs, drugs, and illegal immigration that would impact the Pentagon Facilities.

In the event a PFPA PPD Officer collects information from a member of the public while on duty with the intent of inputting the data into the CAD/RMS application, the PFPA PPD Officer will verbally provide the individual the PFPA Privacy Act Statement and Agency Disclosure Notice. The verbiage provided is:

PRIVACY ACT STATEMENT

Authority: 10 U.S.C. 2674, Operation and Control of Pentagon Reservation and Defense Facilities in National Capital Region; DoD Directive 5105.68, Pentagon Force Protection Agency (PFPA); Administrative Instruction (AI) 30, Force Protection on the Pentagon Reservation; and E.O. 9397, as amended.

Principle Purpose: For Pentagon police to create and maintain incident records that inform time-critical decisions and support their mission to provide security for the Pentagon and its leased facilities.

Routine Uses: Disclosure of records are generally permitted under 5 U.S.C. 552a(b) of the Privacy Act of 1974, as amended. The DoD Blanket Routine Uses set forth at the <http://dpclo.defense.gov/Privacy/SORNsIndex/BlanketRoutineUses.aspx> may apply to this system. Records contained herein may specifically be disclosed outside the DoD as a routine use pursuant to 5 U.S.C. 552a(b)(3) for use in an investigation or to a Federal, state, local, or foreign agencies that administer programs or employ individuals involved in an incident or inquiry.

Disclosure: Voluntary, however, if the requested information is not provided the individual may be subject to arrest if a criminal act has occurred. Once in custody, disclosure is voluntary and non-disclosure notated in the arrest record.

#### AGENCY DISCLOSURE NOTICE

The public reporting burden for this collection of information is estimated to average 20 minutes per response, including the time for reviewing instructions, searching existing data sources, gathering and maintaining the data needed, and completing and reviewing the collection of information. Send comments regarding this burden estimate or any other aspect of this collection of information, including suggestions for reducing the burden, to the Department of Defense, Washington Headquarters Services, Executive Services Directorate, Information Management Division, 4800 Mark Center Drive, East Tower, Suite 02G09, Alexandria, VA 22350-3100 (The OMB Control Number is 0704-TBD)[Insert OMB Control Number once it is assigned]. Notwithstanding any other provision of law, no person shall be subject to any penalty for failing to comply with a collection of information if it does not display a currently valid OMB control number.

Data are input directly into the database by PFPA Pentagon Police Department (PPD), Response, and Dispatch personnel, as it has been input into the former Incident and Criminal Information System (ICIS) for the last decade. The application provides open text fields and drop-down options for inputting non-standard and standard data, respectively. Only PFPA personnel with an active CAD/RMS account and DoD-issued Common Access Card (CAC) can access the data and update reports. All modifications to reports are tagged with a date/time stamp and the PFPA personnel's identity.

These reports are maintained for the period of time allowed by their disposition, then discarded. Each record is assigned an expiration date once closed. Non-criminal records are discarded from the database (i.e., destroyed) one year after the case is closed. Criminal records are cut off when a case is closed and files, both electronic and hard copies, are destroyed 15 years after the cut-off. While active, these reports may be used in an investigation or as part

of a case report submitted to the courts. Upon request, this data may be submitted to a vetted 3<sup>rd</sup> party such as an insurance agent or other law enforcement agency.

### 3. Use of Information Technology

Only PFPA personnel (e.g., responders, dispatchers, PPD) interface with the CAD/RMS system to initiate and input dispatch calls and data into reports in support of their mission to provide security for the Pentagon and its leased facilities. Records can be directly retrieved by PFPA personnel using a respondent's First/Last Name, SSN, or incident # and viewed on the workstation's monitor, which reduces manpower needs to locate records and paper to view reports. During the report approval process, Supervisors sign or push back a report electronically; eliminating the need to print a draft report pre-approval. Information can be redacted using the system, eliminating the need to print, redact, scan, and re-print each report. Additionally, the reports can be readily accessed, searched, and reviewed or updated concurrently by multiple PFPA personnel involved in the incident, thereby reducing the time and manpower resources required to complete the reporting and modification processes.

### 4. Non-duplication

Reports contained within the ICIS database that have not reached their disposition will be imported into the CAD/RMS to maintain those historical records. New records will be created only in the CAD/RMS as ICIS will be decommissioned immediately upon fielding the CAD/RMS.

### 5. Burden on Small Business

There will be no burden placed on small businesses. The individuals from whom information is being collected do not constitute small businesses or other small entities

### 6. Less Frequent Collection

All data collected in the CAD/RMS by PFPA personnel result from daily medical, criminal, and suspicious activities occurring on the Pentagon and its leased facilities by PFPA personnel directly involved in the incidents. Daily investigation of incidents and resulting data collection must be accomplished by PFPA or PFPA would be less able to complete its mission to provide force protection, security, and law enforcement to safeguard personnel, facilities, infrastructure, and other resources for the Pentagon Reservation and for assigned DoD activities and DoD-occupied facilities within the NCR. Data from members of the public is collected only by PFPA PPD Officers as incidents occur and the frequency is not under the control of any PFPA personnel.

### 7. Paperwork Reduction Act Guidelines

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

data are entered into and accessed in the CAD/RMS electronically through an Agency workstation and no policy or process requires these records be initiated in hard copy (i.e., paper). Additionally, there is no requirement any record in CAD/RMS be printed more than the one time required for archival by the National Archives and Records Administration.

#### 8. Consultation and Public Comments

a. A 60-day Federal Register Notice was published in the Federal Register on 09/26/2103, Volume 78, No. 187, page 59,341. No comments were received.

A 30-day Federal Register Notice was published in the Federal Register on 06/09/2104, Volume 79, No. 110, page 32,923.

b. PFPA had been in frequent contact with external federal, state, and local law enforcement agencies to determine the most effective and efficient method of collecting and managing law enforcement data. PFPA used this information to weigh the costs and benefits of automated versus manual records management practices. PFPA personnel utilize industry standard questioning practices in line with those used by law enforcement and responder agencies across the country. No respondents (i.e., persons questioned as the result of a criminal, medical, or suspicious activity incident) have been consulted regarding the methods by which the Agency collects and maintains respondents' information. These respondents are the focus of law enforcement investigations of incidents occurring on Department of Defense property of which they were a party to and cannot be assumed to possess any expertise regarding effective and efficient data collection or management.

#### 9. Gifts or Payment

No payment of gifts will be provided to respondents. Employees involved in the process of collecting information are PFPA personnel who conduct these activities as part of their normal job function.

#### 10. Confidentiality

Records are maintained in areas accessible only to PFPA personnel who use the records to perform their duties. All records are maintained on closed military installations with security force personnel performing installation access control and random patrols. Common Access Cards and personal identification numbers are used to authenticate authorized desktop and laptop computer users. Computer servers are scanned monthly to assess system vulnerabilities. Systems security updates are accomplished daily. The computer files are password protected with access restricted to authorized users with a need for the information. Records are secured in locked or guarded buildings, locked offices, or locked cabinets during non-duty hours, with access restricted during duty hours to authorized users with a need for the information. Additionally, all external requests for information are received and vetted by the Agency point of contact and the Office of General Council, to prevent unwarranted distribution of information. Furthermore, this information is then redacted prior to release.

PFPA will protect the data to the fullest extent of the law per the Privacy Act.

The System of Records Notice (SORN) ID number and title for the CAD/RMS is DPFPA 05, “Interact Computer Aided Dispatch and Records Management System (CAD/RMS)” and a Privacy Impact Assessment (PIA) has been conducted and is included as part of this submission package.

#### 11. Sensitive Questions

The data collected by PFPA personnel from the public includes information relevant only to the respondent(s) involved in the incident and actions observed and executed by PFPA personnel, although some of the information, e.g., race and ethnicity, is considered to be sensitive. Regarding ethnicity and race, PFPA uses categories compliant with those used by the National Crime Information Center (NCIC) and National Incident-Based Reporting System guidelines and standards. Information sharing is essential to providing force protection, security, and law enforcement and therefore PFPA must follow the standards set forth by the larger federal Law Enforcement Agency (LEA) community. As a federal LEA, PFPA is required to provide data that is interoperable with the FBI's NCIC by DODI 1000.30, which dictates rules for police department reporting. The language used in the CAD/RMS application reflects the standard language used by the federal LEA database, the National Crime Information Center, which was developed and is managed by the FBI (60 FR 19775). The FBI chose the language it uses in the NCIC to comply with OMB Directive 15 minimum standards, but also to define a set of values that will be of descriptive value to the criminal justice community.

In addition, SSN is collected from respondents, and an SSN justification is included as part of this submission package. Information not relevant to the investigation of an incident is not collected.

#### 12. Respondent Burden, and its Labor Costs

##### a. Estimation of Respondent Burden

An average of six percent (6%) of the 11,550 events/year logged between 09/07/2012 and 09/06/2013 involve questioning members of the public (i.e., not government civilians or military members), for a total of about 693 incidents/year. The average time per incident calculated is 20 min, giving a total of 231 annual burden hours for the public as a whole.

All information is collected by interview of the respondent by PFPA PPD.

##### b. Labor Cost of Respondent Burden

Visitors from around the world visit the Pentagon all year-round, therefore the average burden has been calculated give the annual average wages for the major economies of the world. These are (in \$US thousands) \$42, \$37, \$28, \$24, \$27, \$34, \$8, and \$23 for United States, China, Japan, Germany, France, UK, Russia, and Italy, respectively. The average of all

average salaries across the world is then \$ 29,000.00/yr and \$14.50 /hr. Given an average of one response per person at 20 min/response, the annual average burden per person is approximately \$5.00. The total annual labor cost comes to \$3,465: 693 \* \$5.00

13. Respondent Costs Other Than Burden Hour Costs

N/A

14. Cost to the Federal Government

The application, licensing, configuration, database build-out, installation, training, and overhead were purchased at a cost of \$710,000.00. This is a one-time cost. The annual maintenance was also purchased in the first year and will be a recurring charge of \$140,000.00/year. The total cost of start-up in the first year is therefore \$850,000.00.

There is no additional burden or cost in manpower associated with the collection, use, or maintenance of the data. Additionally, automated disposition of records from the system relieves personnel the burden of manual reminders and removal of records. The equipment and hardware resources required to access and use the CAD/RMS tool are operationally zero in that no equipment beyond the users' current workstations and printers are required. These items are provided by the Washington Headquarters Services (WHS) agency to each new employee or as part of an office's standard Information Technology equipment.

The average Full Time Equivalent cost to the Agency for a sworn PFPA PPD Officer who conducts interviews of the public is \$107,000/year, as based on the planning grade of AD step 7.7. Given a single Officer is on duty 2080 hours per year, the hourly cost per Officer is \$51/hour. Therefore, the labor cost for the 231 hours spent interviewing members of the public for incidents (from Section 12.a) is \$11,781/year. Following an interview, the Officer will spend, on average, 25 minutes entering the incident data into the system. This adds an additional \$14,726/year to total labor costs for the 288.75 hours to enter 693 incidents into the system. In approximately 11% of cases (76), an incident will result in a court hearing or insurance claim for which an Officer must compile and provide incident documentation to the requestor. An Officer will spend, on average, 40 minutes compiling all required documentation for distribution. This adds an additional \$2,586/year to total labor costs for the 50.7 hours to compile documents from the system for the 76 incidents. The total labor costs stemming from questioning members of the public, incident data entry, and document gathering for the year is \$29,093.

<b>Cost to the Federal Government</b>	
<b>Item</b>	<b>Costs</b>
System Purchase Cost	\$710,000
Maintenance Cost	\$140,000

Labor Cost	\$29,093
Total Costs	\$879,093

15. Reasons for Change in Burden

This is a new collection in that the CAD/RMS replaces the outdated, ineffective ICIS.

16. Publication of Results

The information collected in the CAD/RMS is of law enforcement nature solely for use in documenting and investigating incidents and will not be used for outlining plans for tabulation, statistical analyses, or publication.

17. Non-Display of OMB Expiration Date

There is no request for approval to omit display of the expiration date of OMB approval on the instrument of collection.

18. Exceptions to "Certification for Paperwork Reduction Submissions"

N/A.