Supporting Statement for Defense Biometric Identification Records System (ABIS) Paperwork Reduction Act Submission & OMB Control Number Request *Reference Associated OMB Form 83-I*

A. JUSTIFICATION

1. <u>Need for Information Collection</u>

In a 13 January 2012 Department of Defense (DoD) Memorandum [OSD 14940-11], the Deputy Secretary of Defense (DSD) authorized all Combatant Commanders and Military Departments to employ DoD biometric capabilities across the full range of military operations unless otherwise prohibited by law or agreement. The Automated Biometric Identification System (ABIS) matches and stores biometric data collected by global U.S. forces during the course of military operations. Data may also be collected for use in field identification and recovery of persons, or their physical remains, who have been captured, detained, missing, prisoners of war (POW), or personnel recovered from hostile control. The data collected in accordance with these policies, stored as approved by the Records Retention Schedule, supports military operations including, but not limited to, counterterrorism and installation access. While a small percentage of the population included in ABIS are active duty military, the large majority include Foreign Nationals and other members of the public as required.

Authority for ABIS is derived from: 10 U.S.C. 113, Secretary of Defense; 10 U.S.C. 3013, Secretary of the Army; Homeland Security Presidential Directive (HSPD)-6, Integration and Use of Screening Information; HSPD-11, Comprehensive Terrorist-Related Screening Procedures; National Security Presidential Directive (NSPD)-59/HSPD-24, Biometrics for Identification and Screening to Enhance National Security; DoDI 2000.12, DoD Antiterrorism (AT) Program; DoD Instruction 2310.5, Accounting for Missing Persons; DoD Directive 2310.7, Personnel Accounting – Losses Due to Hostile Acts; Defense Prisoner of War/Missing in Action Office; DoDI 5200.08, Security of DoD Installations and Resources; DoDD 8521.01E, DoD Biometrics; DoDD 8500.1, Information Assurance; DoD 5200.08-R, Physical Security Program; AR 25-2, Information Assurance; AR 190-8, Enemy Prisoners of War, Retained Personnel, Civilian Internees and Other Detainees; AR 525-13, Antiterrorism; E.O. 9397 (SSN), as amended.

2. <u>Use of Information</u>

The information collected and processed by DoD ABIS is used by DoD, FBI, DHS, other government agencies, and approved international partners for intelligence, force protection, national security, and law enforcement purposes. DoD provides collected and processed information to the Terrorist Screening Center to place individuals on National Watchlists. Required fields for every record include: Name, 10 fingerprints, and 2 iris scans. All other data fields in ABIS are optional and vary based on each record and situation.

3. <u>Use of Information Technology</u>

DoD ABIS submissions and responses are nearly 100% (>99%) electronic and automated. There are a small number of exceptions for customers who cannot provide electronic records or records that require manual input. Manual processes are constantly reviewed to determine if they can be automated.

In accordance with the Paperwork Reduction Act, the OMB control number and expiration date will be made available, formatted as seen in Attachment A. The Agency Disclosure Notice and Privacy Act Statement are also included, as seen in the attachment.

For possible data fields collected from respondent, reference "DoD Electronic Biometric Transmission Specification – 8 Dec 2011 – Version 3.0" (Attachment B). In most cases, many of the data fields are not completed due to limited information provided and/or expediency of operational collection activity. Different types of enrollments drive varied data fields (as described within the document). In summation [see pg.8], record types are divided into categories: Type-1, 2, 9, 10, 13-15, 17, 18, 20, 21, 98, & 99; each includes various biographical, contextual, biometric, and/or administrative data. More detailed breakdown for each Type is provided within the document [see pgs. 17-76].

4. <u>Non-Duplication</u>

DoD ABIS is a biometric search system. One of its primary functions is to de-duplicate records. All biometric submissions are searched against previous biometric submissions with any matches consolidated into one record with appropriate markers denoting each record in the set.

5. <u>Burden on Small Business</u>

Small businesses and other small entities will not be affected by this collection.

6. <u>Consequences of Not Collecting the Information</u>

Without this collection, matching, and sharing of biometric and associated contextual data there would be significant implications to National Security and security of our forces deployed abroad.

7. <u>Paperwork Reduction Act Guidelines</u>

N/A

8. <u>Consultation and Public Comments</u>

Notice of proposed collection was published in the Federal Register on April 8, 2014 (79 FR 19321). No comments were received. The 30 day notice was published in the Federal Register on August 6, 2014. Comments will be accepted until September 6, 2014.

The 30 day notice was published with a much higher estimated burden. This was a calculation error accounting for the total records currently in the system and not the annual calculations. This has been revised in Section 12 below.

9. <u>Payment to Respondents</u>

No payments, gifts, or guarantees are made to respondents who provide this information.

10. <u>Confidentiality</u>

In according with the Privacy Act, data will be protected to the extent permitted by law. This updated SORN is undergoing staffing; a working DRAFT is included in Attachment C.

Applicable SORN: A0025-2b DoD PMG

In accordance with the E-Government Act of 2002, an applicable Privacy Impact Assessment (PIA) for the DoD ABIS is being drafted and submitted by the controlling agency. View Attachment D for sections 1 and 2 of the draft PIA.

In accordance with the Federal Records Act, the Records Retention Schedule: DoD ABIS has received approval for its disposition schedule: Destroy 75 year(s) after the cutoff or when no longer needed for military operations or DoD business functions occurs, whichever is later.

11. <u>Personal Identifying Information, Sensitive Questions, and Protection of</u> <u>Information</u>

Data collected may include personally identifiable information (PII) such as biometric records, name, citizenship, date of birth, and other personal information. PII is collected to facilitate identity verification for individuals associated with, encountering, or posing a threat to DoD facilities and personnel. Computerized records are maintained in a controlled area accessible only to authorized personnel. Physical and electronic access is restricted to designated individuals requiring such access in the performance of official duties.

12. <u>Respondent Burden and Labor Costs</u>

a. Estimation of Response Burden (Hours) On an annual basis, the hour response burden is approximately 208,000 hours.

b. Explanation of How Burden was Estimated

Included in the hours burden estimate are the total hours required to provide responses, including all DoD ABIS direct staff actions. There are 2,422,475 respondents annually. It takes approximately 5 minutes for them to provide their information, a total of 208,000 hours annually.

c. Labor Cost of Response Burden

The estimated cost per hour is \sim \$100.64. The number of annual hours listed in 12 (a) is 208,000. Cost is \$100.64 X 208,000= \sim \$20, 933,120.

13. <u>Respondent Costs Other than Burden Hour Costs</u>

No additional cost to the Respondent other than their labor cost listed above.

14. <u>Cost to the Federal Government</u>

a. Total Capital and Start-up Cost Component

Costs other than labor include annualize investment in hardware/software/maintenance, and hardware/refresh, totaling \$3,130,588.54.

b. Total Operation and Maintenance and Purchase of Services Component Costs other than labor include operation and maintenance in communications/services/accreditations, hardware/software/maintenance, hardware/refresh, facility/infrastructure, and travel, totaling \$11,371,446.67.

Cost of response burden includes annual Labor O&M and annualized investment costs (\$20,109,734.46 + \$822,425.35= **\$20,932,159.81**).

15. <u>Change in Burden</u>

Changes in annual hour and cost burden are associated with this being an initial request for OMB certification. The DoD ABIS itself has consistent hour and cost burdens from year-toyear.

16. <u>Publication of Results</u>

N/A

17. <u>Non-Display of OMB Expiration Date</u>

N/A

18. <u>Exceptions to "Certification for Paperwork Reduction Submissions"</u>

No exceptions to the certification statement are being sought.

B. COLLECTION OF INFORMATION EMPLOYING STATISTICAL METHODS Statistical methods are not employed for this collection of information