

Supporting Statement for Paperwork Reduction Act Submissions
Approval of an existing collection currently in use without an OMB control number for the
Request for III/NGI Base Identifier(s) Form (1-542)
OMB Control # 1110-0061

The most recent version of this form is dated March 28, 2014.

Part A. Justification

1. Necessity of Information:

Title 28, United States Code, Section 534, directs the Attorney General to acquire, collect, classify, and preserve identification, criminal identification, crime, and other records. It further directs the exchange of records and information with, and for the official use of, authorized officials of the Federal Government, including the United States Sentencing Commission; the States and cities; and penal and other institutions.

The Request for III/NGI Base Identifiers Form (1-542) is necessary so that the FBI, Criminal Justice Information Services (CJIS) Division, can assure identity history information is collected, stored, and disseminated in a manner to ensure accuracy, completeness, currency, integrity, and security in an effort to protect individual privacy as required by 28 CFR 20.1. The form provides a consistent manner in which authorized agencies can update the biographic and/or descriptor information within the Interstate Identification Index (III) System to guarantee the most accurate information is maintained within the FBI identity records.

The CJIS Division maintains a centralized national repository of fingerprint cards and arrest records. This repository provides information regarding the past activities of an individual in custody or an individual applying for employment.

2. Needs and Uses:

The CJIS Division serves the nation as a repository for fingerprints and identity history information. The Privacy Act of 1974 requires each agency that maintains a system of records to maintain the records with such accuracy, relevance, timeliness, and completeness as is reasonably necessary to assure fairness to the individual. Case law stipulates that the CJIS Division has a duty to take reasonable measures to maintain accurate records. The 1-542 provides a consistent format for agencies to submit necessary identity history information.

3. Use of Technology:

Currently, the CJIS Division manually enters the data submitted on the 1-542 form. There are no plans to explore automation options for receiving and updating the form information in the near future.

4. Efforts to Identify Duplication:

The FBI is the only federal agency authorized to conduct the identity history summary request for the data from this information collection.

5. Methods to Minimize Burden on Small Businesses:

This information will have no significant impact on small entities. Small businesses will not be affected by this collection.

6. Consequences of Less Frequent Collection:

If the collection is not conducted or conducted less frequently, the identity history information provided for use by all contributing agencies would be incomplete and inaccurate. The law enforcement community has an ever-increasing need for timely and accurate data. Obtaining the 1-542 is vital to ensuring the most accurate data is provided to all authorized entities accessing the NGI system to conduct background checks for employment and licensing, as well as those agencies accessing the NGI system for criminal investigations and court sentencing decisions.

7. Special Circumstances Influencing Collection:

All 1-542 forms are collected and processed from participating agencies, as necessary. In accordance with Title 28 CFR 20.37, agencies are required to submit 1-542 forms to the FBI CJIS Division. All stored identity history information is inclusive of only that information which has been provided.

8. Public Comments and Consultations:

The FBI sponsors and participates in training seminars, industry meetings, and conferences with the user community. These meetings are held regularly and provide an open forum to discuss matters of mutual concern, including reporting procedures. The FBI consults with users on an individual basis as needed. Additionally, the 30 and 60-day Notices of Information Collection has been published in the Federal Register. No comments were received.

9. Payment of Gift to Claimants:

The FBI does not provide any payment or gift to respondents.

10. Assurance of Confidentiality:

Information requested in this collection may be considered confidential business information. Its release is governed by law, regulations, and agency procedures.

11. Justification for Sensitive Questions:

This collection does not include questions of a sensitive nature.

12. Estimate of Hour Burden:

Number of respondents	114,000
Frequency of response	as needed
Total annual responses	114,000
Minutes per response	15 minutes
Annual hour burden	28,500 hours

13. Estimate of Cost Burden:

Respondents will not incur any costs other than their time to respond. Respondents will not incur any capital, start up, or system maintenance costs associated with this information collection.

14. Estimated Annualized Costs to Federal Government:

Note: The Request to Change III/NGI Base Identifier(s) forms are received and processed by the same personnel. Therefore, the associated costs were added together on one line.

Personnel Salaries:	\$ 26,436
Analysis of incoming information:	\$ 208,770.00
Conversion to electronic format:	\$ 208,770.00
Total Cost:	\$ 443,976.00

15. Reasons for Change in Burden:

The total number of annual responses has increased as we have identified and captured all responses regardless if the 1-542 form was utilized by the agency to submit the necessary identity history information. Furthermore, previously the cost for analysis and conversion to electronic format was not assessed and reported. By incorporating these calculations, we have identified an increase in the total cost associated with processing the 1-542 form.

16. Plans for Publication:

There are no plans to publish the information collected.

17. Expiration Date Approval:

Due to the administrative burdens related to replacing expired forms when no information on those forms has been changed, the FBI is requesting approval to not display the expiration date

for OMB approval of the information collected.

18. Exceptions to the Certification Statement:

There are no exceptions to the certification statement

Part B. Statistical Methods

The FBI does not employ statistical methods in this information collection.