

**SUPPORTING STATEMENT A
FOR PAPERWORK REDUCTION ACT STATEMENT SUBMISSION
United States Park Police
Pre-employment Suitability Determination Process
OMB Control Number 1024-0245**

Terms of Clearance: None.

Justification

1. Explain the circumstances that make the collection of information necessary. Identify any legal or administrative requirements that necessitate the collection.

The United States Park Police (USPP) is a unit of the National Park Service, Department of the Interior, with jurisdiction in all National Park Service areas and certain other Federal and State lands. The USPP are highly trained, professional police officers who prevent and detect criminal activity; conduct investigations; apprehend individuals suspected of committing offenses against Federal, State, and local laws; provide protection to the President of the United States and visiting dignitaries; and provide protective services to some of the most recognizable monuments and memorials in the world.

As part of the application process for consideration as a candidate for United States Park Police Officer positions, we collect information from applicants during the Pre-employment Suitability Determination Phase of the application process to narrow the list of potential candidates who are qualified to move to the next phase of the application process. The USPP application process consists of 6 phases: (1) Application via USAJobs.com; (2) Pre-employment Suitability Determination; (3) written examination; (4) oral interview; (5) physical and psychological evaluations; and (6) physical fitness and agility tests. Background clearances are not initiated until the candidate has successfully passed all six (6) phases of the USPP application process.

Our authority to collect this information is derived from the following:

- Title 5, United States Code, Sections 1302 and 1304, "Special Authority";
- Title 5, United States Code, Section 3301, "Civil Service; generally";
- Title 18, United States Code, Section 922, "Unlawful acts";
- Executive Order 10450, Sections 8(b), 8(c), and 9(c), "Security requirements for Government employment"; and
- Title 5, Code of Federal Regulations, Section 5.2, "Investigation and evaluations".

It should also be noted that Department of the Interior policy 446 DM 21 prohibits the use of the polygraph. This directive specifically limits the usage of this technology to criminal investigations. "No other use of the polygraph is authorized within the Department of the Interior." Without this valuable tool as part of our Pre-employment Suitability Determination Phase, the USPP must rely solely on the forms in this information collection request to provide the necessary information for the requested time periods to assist us in conducting pre-employment investigations on each eligible applicant.

2. Indicate how, by whom, and for what purpose the information is to be used. Except for a new

collection, indicate the actual use the agency has made of the information received from the current collection. Be specific. If this collection is a form or a questionnaire, every question needs to be justified.

We estimate that 3,000 to 5,000 individuals will apply annually for the position of a USPP officer. Of this total, approximately 2,500 applicants will pass initial screening tests and complete the below listed forms as part of the USPP Pre-Employment Suitability Determination Phase of the applicant process. This phase is used to further screen applicants to select only the most qualified candidates to continue the application process. These forms are used as part of the formal pre-employment background process. An OPM background investigation, initiated via the e-QIP system, is not initiated until applicants have completed and passed all phases of the applicant process and only after they have been determined to meet all USPP candidate requirements.

If an applicant is eventually hired, the forms become part of their employee security file. If an applicant is not hired, the forms are secured and later destroyed in accordance with the specific document disposal requirements outlined in the NPS Consolidated Servicewide Records Schedule (N1-79-08-4). The records retention requirements are also now included on each form.

Form 10-2201, "Personal Qualifications Statement" provides information on the personal history of the candidate. We have not made any substantive changes to the form, only minor edits to clarify instructions or improve readability and formatting changes to meet new DOI and NPS forms standards. Investigators verify the information provided and use it to determine an applicant's suitability for a USPP officer position. The USPP requires page 31 of Form 2201 to be notarized prior to submission. Using the notary process, each applicant is attesting to the completeness and accuracy of each statement made within the form. Any differences from the information submitted in these forms found during a pre-employment qualification check may be used as reason to remove the applicant from further consideration.

Information collected via Form 10-2201 includes:

- Personal data
 - Name
 - Alias, maiden name, nicknames
 - Legal name change information
 - Date of birth
 - Social Security Number
 - Sex
 - Citizenship/dual citizenship information
 - Passport information
 - Present and legal addresses
 - Contact numbers
- Selective Service and military service data
 - Selective Service registration data
 - Applications for military service
 - Highest rank held in the military
 - Rank at time of discharge
 - Re-enlistment information
 - Type and circumstances of discharge
- Disciplinary action during service
- Criminal investigations during service
- Financial data
 - Wage garnishments
 - Financial delinquencies
 - Tax delinquency
 - Liens
 - Repossessions
 - Court-ordered financial judgments
 - Bankruptcies/wage earner plans
 - Spousal income
 - Financial obligations, to include type, monthly payment, balance, and to whom owed
 - Civil court actions
- Detailed information for references
- Detailed information for personal associates
- Education data

- o High school and college information
- o Dates attended
- o Characterization of performance
- o Disciplinary action during enrollment
- o Arrests by college/university police
- Employment data
- Driving record
- Arrest/conviction and criminal history
- Applicant essay
- Alcohol usage
- Criminal history information
- Education information
- Gambling information
- Miscellaneous information (such as firearm permits, special skills, other languages, hobbies and interests, other enforcement agencies where applicant applied, whether or not applicant previously applied for a USPP officer position)
- Conditions of Employment

The following forms have been in use without approval due to the USPP and are now being submitted with this revision for clearance by OMB.

Form 10-2201A, “Information Release Form”, authorizes the release of all personal and confidential records, to include medical records concerning physical and mental health, to the USPP necessary as part of the Pre-employment Suitability Determination Phase to determine the suitability of the candidate for employment with the USPP. The USPP requires Form 10-2201A notarized prior to submission because each applicant is providing this form as permission for third parties (employers, courts, neighbors, etc.) to provide information on behalf of that applicant. The notary seal verifies that each applicant is aware of the usage of this form, as verified by the notary.

Information collected via Form 10-2201A includes:

- Full legal name
- Social Security Number

Form 10-2201B, “Release to Obtain a Credit Report”, authorizes the release of information from consumer reporting agencies to the USPP necessary as part of the Pre-employment Suitability Determination Phase to determine the suitability of the candidate for employment with the USPP.

Information collected via Form 10-2201B includes:

- Full legal name
- Other names used (alias, maiden, nicknames, etc.)
- Date of Birth
- Social Security Number
- Home Telephone Number
- Current occupation
- Employer name
- Present address
- Previous Address

Form 10-2201C, “Lautenberg Certification”, requires information and certification by the applicant regarding a conviction of a misdemeanor crime of domestic violence. This certification is required to determine the suitability of the candidate to move forward in the Pre-employment Suitability Determination Phase of the USPP candidate selection process.

Information collected via Form 10-2201C includes:

- Whether candidate has ever been convicted of a misdemeanor crime of domestic violence. If yes, the candidate must provide the court jurisdiction, docket/case number, statute/charge, and the date of sentencing
- Applicant’s full name/signature, and
- Witness’ full name/signature.

Form 10-2201D, “Physical Efficiency Battery “Waiver””, requires the candidate to provide the following information regarding medical conditions that may impede their ability to meet the minimum efficiency score on the Physical Efficiency Battery (PEB), a requirement of the Pre-employment Suitability Determination Phase of the USPP candidate selection process.

Information collected via Form 10-2201D includes:

- Date of last medical examination
- Name and address of medical doctor, and
- Purpose of the last medical examination
- Any known medical conditions the USPP should be aware of.

Form 10-2201E, “Physician Consent Form”, is required to document the medical clearance by a physician for the candidate to participate in the PEB as part of the Pre-employment Suitability Determination Phase of the USPP candidate selection process.

Information collected via Form 10-2201E includes:

- Physician’s determination whether the candidate is or is not cleared to participate in the PEB
- Relevant comments by the physician, and
- Physician’s name, complete mailing address and phone number.

Form 10-2201F, “Applicant Documentation Form”, is completed by the applicant when declining or deferring employment with the USPP.

Information collected via Form 10-2201F includes:

- Full name
- Social Security Number
- Address
- Telephone number
- Date and location of written test
- Reason for declining employment with the USPP, and/or
- Reason for deferring employment with the USPP.

3. Describe whether, and to what extent, the collection of information involves the use of automated, electronic, mechanical, or other technological collection techniques or other forms of information technology, e.g., permitting electronic submission of responses, and the basis for the decision for adopting this means of collection. Also describe any consideration of using information technology to reduce burden and specifically how this collection meets GPEA requirements.

All forms used during the Pre-employment Suitability Determination phase of the USPP application process are available as fillable MS Word files that applicants can download, save, and reopen as they being completed. The NPS is actively participating in the new DOI-wide “Electronic Forms System” (EFS) and the USPP is exploring the option of using this system to automate some or all of the forms; however, we do not have a firm date for implementing this process change. Regardless of whether the forms are hand-written or electronically filled out and printed, applicants must bring hard-copies of each completed form with them when they report to the Physical Evaluation Phase. Applicants are required to bring a hard copy of all completed documents with them to the Physical Evaluation Board (PEB) to facilitate the review of their documents during the PEB. The hard copies also serve as the applicant’s official, certified submission which prevents the information from being altered later in the process.

4. Describe efforts to identify duplication. Show specifically why any similar information already available cannot be used or modified for use for the purposes described in Item 2 above.

The forms used in this collection are unique forms in the Federal government because the USPP hiring process is different from other Federal law enforcement due to DOI's prohibition to utilize the polygraph as part of the screening process. Other agencies ask for similar and possibly identical information; however, they do so at different points throughout the applicant screening and hiring process. The completion of these forms during the Pre-employment Suitability Determination Phase of the USPP hiring process is necessary to determine whether the candidate is suitable to move forward in the selection process prior to initiating the formal background investigation phase. There is no single form that asks the detailed questions for the required time periods necessary for USPP to adequately screen candidates for the critical sensitive position of a USPP officer. We also do not have access to personal history information an applicant may have provided to another agency.

5. If the collection of information impacts small businesses or other small entities, describe any methods used to minimize burden.

This collection of information does not impact small businesses or other small entities

6. Describe the consequence to Federal program or policy activities if the collection is not conducted or is conducted less frequently, as well as any technical or legal obstacles to reducing burden.

If the information were not collected, the USPP would not be able to hire adequately screened applicants for USPP officer positions. This would adversely affect the protection and preservation of monuments and memorials, the protection of visitors, and our ability to detect and deter crime.

7. Explain any special circumstances that would cause an information collection to be conducted in a manner:

- * require respondents to report information to the agency more often than quarterly;
- * requiring respondents to prepare a written response to a collection of information in fewer than 30 days after receipt of it;
- * requiring respondents to submit more than an original and two copies of any document;
- * requiring respondents to retain records, other than health, medical, government contract, grant-in-aid, or tax records, for more than three years;
- * in connection with a statistical survey that is not designed to produce valid and reliable results that can be generalized to the universe of study;
- * requiring the use of a statistical data classification that has not been reviewed and approved by OMB;
- * that includes a pledge of confidentiality that is not supported by authority established in statute or regulation, that is not supported by disclosure and data security policies that are consistent with the pledge, or which unnecessarily impedes sharing of data with other agencies for compatible confidential use; or
- * requiring respondents to submit proprietary trade secrets, or other confidential information, unless the agency can demonstrate that it has instituted procedures to protect the information's confidentiality to the extent permitted by law.

There are no circumstances that require us to collect the information in a manner inconsistent with

OMB guidelines.

8. **If applicable, provide a copy and identify the date and page number of publication in the Federal Register of the agency's notice, required by 5 CFR 1320.8(d), soliciting comments on the information collection prior to submission to OMB. Summarize public comments received in response to that notice and in response to the PRA statement associated with the collection over the past three years, and describe actions taken by the agency in response to these comments. Specifically address comments received on cost and hour burden.**

Describe efforts to consult with persons outside the agency to obtain their views on the availability of data, frequency of collection, the clarity of instructions and recordkeeping, disclosure, or reporting format (if any), and on the data elements to be recorded, disclosed, or reported.

Consultation with representatives of those from whom information is to be obtained or those who must compile records should occur at least once every three years — even if the collection of information activity is the same as in prior periods. There may be circumstances that may preclude consultation in a specific situation. These circumstances should be explained.

On May 29, 2015, we published in the Federal Register (80 FR 30721) a Notice of our intent to request that OMB renew this information collection. In that Notice, we solicited comments for 60 days, ending on July 28, 2015. We did not receive any comments in response to that Notice.

In addition to the Federal Register notice, we contacted nine (9) former applicants to get feedback on how long it takes to complete the forms package, as well as on the necessity and clarity of the forms as part of the Pre-Employment Suitability Process:

All commenters agreed that the information was necessary and the questions were clear.

One commenter stated that a detailed resume and references would be as valuable as the form and more concise.

NPS Response/Action Take: *Resumes are not standardized and we believe many applicants may inadvertently leave out important information which would remove them from further consideration. Therefore, we have not made any changes to the forms based on this comment.*

Three commented that the questions were repetitive and that time could be saved by eliminating duplicate questions, that the requirement for recalling all addresses is a chore, and that much of the information duplicates information required on OPM security clearance forms.

NPS Response/Action Take: *We note the statements regarding duplicate questions. The intention of the duplicate questioning is to ensure consistency throughout the applicant processing and to identify potential fraudulent response activity by an applicant. We have not made any changes to the forms based on this comment.*

Two commenters said it would be helpful if the form were electronic.

NPS Response/Action Take: *We agree that electronic forms would be helpful; however, we do not have*

the infrastructure to support an all-electronic submission system at this time. We will continue to use the fillable MS Word versions until such resources are available to develop and maintain an electronic system. We will be working with the Bureau Forms Manager to determine the suitability of including these forms as part of the new DOI Enterprise Forms System initiative in FY2017.

Two commenters stated that it took 8 hours to complete the forms in the applicant package; three indicated it took between 8 to 10 hours; four commenters stated 3-4 hours; and one commenter indicated 12 hours.

NPS Response/Action Take: We adjusted the total burden hour estimate for Form 10-2201, "Personal Qualification Statement" down to 7 (from 8 hours) hours based on these comments and based on past experience administering this collection. It should be noted the previous estimate of 8 hours included the time to complete the additional forms which were not approved by OMB. Our total revised burden hour for all forms in this collection is now 7 hours, 2 minutes, which is in line with the comments received during the outreach process. The revised forms are more streamlined and more easily fillable in the MS Word format which we anticipate will help to reduce time spent completing them in the future.

9. Explain any decision to provide any payment or gift to respondents, other than remuneration of contractors or grantees.

We do not provide any payments or gifts to respondents.

10. Describe any assurance of confidentiality provided to respondents and the basis for the assurance in statute, regulation, or agency policy.

All forms are stored in compliance with OPM/Govt-5 (5 CFR 297; 71 FR 35351) in secure areas in locked file cabinets and treated as confidential information. Only individuals with a need to use the information have access. The information collection complies with the Privacy Act of 1974 and OMB Circular A-130. Such information may be exempt from disclosure under the FOIA (5 U.S.C. 552).

11. Provide additional justification for any questions of a sensitive nature, such as sexual behavior and attitudes, religious beliefs, and other matters that are commonly considered private. This justification should include the reasons why the agency considers the questions necessary, the specific uses to be made of the information, the explanation to be given to persons from whom the information is requested, and any steps to be taken to obtain their consent.

We ask questions of a personal nature essential to determining the suitability of an applicant for employment as a USPP officer; however, we do not ask sensitive questions such as those described above.

12. Provide estimates of the hour burden of the collection of information. The statement should:

- * **Indicate the number of respondents, frequency of response, annual hour burden, and an explanation of how the burden was estimated. Unless directed to do so, agencies should not conduct special surveys to obtain information on which to base hour burden estimates. Consultation with a sample (fewer than 10) of potential respondents is desirable. If the hour burden on respondents is expected to vary widely because of differences in activity, size, or complexity, show the range of estimated hour burden, and explain the reasons for the**

variance. Generally, estimates should not include burden hours for customary and usual business practices.

- * If this request for approval covers more than one form, provide separate hour burden estimates for each form and aggregate the hour burdens.
- * Provide estimates of annualized cost to respondents for the hour burdens for collections of information, identifying and using appropriate wage rate categories. The cost of contracting out or paying outside parties for information collection activities should not be included here.

We estimate the dollar value of the annual burden hours to be \$688,558 (rounded). We used the below listed rates in accordance with Bureau of Labor Statistics news release [USDL-16-1150](#), September 8, 2016, Employer Costs for Employee Compensation—June 2016, to obtain the average hourly wages (including benefits):

- Individuals. Table 1 lists the hourly rate for all workers \$34.05, including benefits.
- Private Sector. Table 5 lists the hourly rate for management, professional, and related workers as \$57.42, including benefits.

Activity	Total Annual Responses	Completion Time per Response	Total Annual Burden Hours *	Hourly Labor Costs including Benefits	Total Dollar Value of Annual Burden Hours
Form 10-2201, "Personal Qualifications Statement" (Individual)	2,500	7 Hours	17,500	\$ 34.05	595,875.00
Form 10-2201A, "Information Release Form" (Individual)	2,500	15 Min	625	34.05	21,281.25
Form 10-2201B, "Release to Obtain a Credit Report" (Individual)	2,500	10 Min	417	34.05	14,198.85
Form 10-2201C, "Lautenberg Certification" (Individual)	2,500	5 Min	208	34.05	7,082.40
Form 10-2201D, "Physical Efficiency Battery "Waiver"" (Individual)	2,500	10 Min	417	34.05	14,198.85
Form 10-2201E, "Physician Consent Form" (Private Sector)	2,500	15 Min	625	57.42	35,887.50
Form 10-2201F, "Applicant Documentation Form" (Individual)	15	5 Min	1	34.05	34.05
Total:	15,015		19,793		\$688,557.90

* Rounded to match ROCIS

13. Provide an estimate of the total annual non-hour cost burden to respondents or recordkeepers resulting from the collection of information. (Do not include the cost of any hour burden already reflected in item 12.)

- * The cost estimate should be split into two components: (a) a total capital and start-up cost component (annualized over its expected useful life) and (b) a total operation and maintenance and purchase of services component. The estimates should take into account costs associated with generating, maintaining, and disclosing or providing the information (including filing fees paid for form processing). Include descriptions of methods used to estimate major cost factors including system and technology acquisition, expected useful life of capital equipment, the discount rate(s), and the time period over which costs will be incurred. Capital and start-up costs include, among other items, preparations for collecting

information such as purchasing computers and software; monitoring, sampling, drilling and testing equipment; and record storage facilities.

- * If cost estimates are expected to vary widely, agencies should present ranges of cost burdens and explain the reasons for the variance. The cost of purchasing or contracting out information collection services should be a part of this cost burden estimate. In developing cost burden estimates, agencies may consult with a sample of respondents (fewer than 10), utilize the 60-day pre-OMB submission public comment process and use existing economic or regulatory impact analysis associated with the rulemaking containing the information collection, as appropriate.
- * Generally, estimates should not include purchases of equipment or services, or portions thereof, made: (1) prior to October 1, 1995, (2) to achieve regulatory compliance with requirements not associated with the information collection, (3) for reasons other than to provide information or keep records for the government, or (4) as part of customary and usual business or private practices.

The total nonhour annual cost burden is **\$239,002** broken down as follows:

Form	Notary Fees	Average Cost for Additional Supporting Documents	Copies	Average Cost per Form	# of Responses	Total Nonhour Annual Cost Burden*
Form 10-2201	\$10.00	\$60.00	\$15.00	\$85.00	2,500	\$212,500
Form 10-2201A	10.00		0.10	10.10	2,500	25,250
Form 10-2201B			0.10	0.10	2,500	250
Form 10-2201C			0.10	0.10	2,500	250
Form 10-2201D			0.10	0.10	2,500	250
Form 10-2201E			0.10	0.10	2,500	250
Form 10-2201F			0.10	0.10	15	2
Total:				\$95.60		\$238,752

* Rounded to match ROCIS

Forms 10-2201 and 10-2201A - Although Forms 10-2201 and 10-2201A are available in a fillable format, applicants must print the form and have it notarized. We estimate the cost for the notarization fee for each form is approximately \$10.00.

Supporting Documents - Applicants must supply a variety of supporting documents (see page 1 of Form 10-2201). The average nonhour burden cost to obtain, copy, or notarize/certify these documents will vary depending upon the number and type of documents required to support claims of education, driver's license history, tax history, marital history, military service, court information etc. We estimate the average cost for providing supporting documents to be:

- Notary costs will vary; an average cost per notary stamp is about \$10.00.
- Cost to obtain certified driving records is approximately \$15.00 per record.
- Cost to obtain other legal records will vary depending upon the type of record to be obtained, up to \$5.00 plus \$0.10 per page
- Cost of obtaining court records varies greatly. Some may be free, some may charge up to \$0.10 per page.

- Education transcripts may cost up to \$20.00 per request.
- Average retail price per page for copies is approximately \$0.10.
- Copies of tax transcripts are usually free, but some States may charge a fee.
- Consumers are entitled to a free copy of a credit report annually.
- Military records should also be free to the current/former service member, although there may be unanticipated administrative costs.

14. Provide estimates of annualized cost to the Federal government. Also, provide a description of the method used to estimate cost, which should include quantification of hours, operational expenses (such as equipment, overhead, printing, and support staff), and any other expense that would not have been incurred without this collection of information.

We estimate the total annual cost to the Federal Government is \$82,459 (rounded) which includes staff salaries for the time to review applicant submission costs. Of the 2,500 applicants who complete the Pre-Employment Suitability Phase forms package, approximately 2,000 will actually attend the physical examination. A panel of USPP officers, background investigators, and human resources specialists convene to review the forms to verify the information and screen for applicant suitability. The class, subclass, step, grade, and years of service of employees who work with this information collection vary. Changes in available staffing and resources increased the panel duration to 7 days (from 2 days previously) for an average of 13 hours each day (91 hours) to review the 2,000 forms packages.

Salary Costs - \$82,459 (rounded) (\$906.14 X 91 hours)

Position*	Hourly Pay Rate	Hourly rate including benefits (1.57 x hourly rate)	Number of Positions	Total Hourly Cost (hourly benefit rate X no. of employees)
Sergeant 4/5 - 22 (Law Enforcement)	\$ 52.26	82.05	4	\$ 328.20
Officer 1/1 - 4 (Law Enforcement)	\$ 30.40	47.72	3	\$ 143.17
Detectives 3/4 - 15 (Law Enforcement)	\$ 45.39	71.26	2	\$ 142.53
Background Investigators GS-12/06 (General Schedule)	\$ 43.46	68.23	2	\$ 136.48
HR Specialist GS-09/05 (General Schedule)	\$ 29.02	45.56	1	\$ 45.56
HR Specialist GS-11/05 (General Schedule)	\$ 35.11	55.12	2	\$ 110.24
Total				\$ 906.14

*To determine average hourly rates, we used:

- 1) Salary Table 2016 – United States Park Police FPPS Table Number 40010
- 2) Office of Personnel Management Salary Table [2016-DCB](#) for General Schedule Positions
- 3) We multiplied hourly overtime rates by 1.57 to account for benefits, in accordance with Bureau of Labor Statistics news release [USDL-16-1150](#), September 8, 2016, Employer Costs for Employee Compensation—June 2016.

15. Explain the reasons for any program changes or adjustments in hour or cost burden.

This is an existing collection with seven (7) new forms added which were in use without approval. USPP Form 1 was previously approved under 1024-0245 but is now officially re-designated as NPS Form 10-

2201. The remaining seven (7) forms which were in use without OMB approval are assigned form numbers 10-2201A through 10-2201F.

With the submission of the additional forms in use without approval, we are reporting an increase of 12,515 annual responses and a reduction of 207 burden hours. The estimate of 8 hours previously reported for this collection included the time for the applicants to complete the entire package (Form 10-2201 and the forms in use without approval) despite the additional forms not being submitted for approval. The reduction in our burden hour estimate is due to the reduced completion time of the forms. The reduced time is based on comments received during the outreach process and on past experience administering this collection. Additionally, the revised forms are more streamlined and more easily fillable in the MS Word format which should help to reduce time spent completing them.

We are also reporting an increase in the nonhour annual cost burden of \$11,252. This increase is due to increased costs associated with providing the required supporting documentation, as well as notary fees and costs associated with making copies of the documents.

16. For collections of information whose results will be published, outline plans for tabulation and publication. Address any complex analytical techniques that will be used. Provide the time schedule for the entire project, including beginning and ending dates of the collection of information, completion of report, publication dates, and other actions.

We will not publish the results of this information collection.

17. If seeking approval to not display the expiration date for OMB approval of the information collection, explain the reasons that display would be inappropriate.

We will display the OMB control number and expiration date on all forms.

18. Explain each exception to the topics of the certification statement identified in "Certification for Paperwork Reduction Act Submissions."

There are no exceptions to the certification statement.