

**1 Supporting Statement A for
Paperwork Reduction Act Submission**

**NATIONAL PARK SERVICE BACKGROUND CLEARANCE INITIATION REQUEST
OMB Control Number 1024-New**

Note: This is new collection.

Terms of Clearance. None.

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

The National Park Service (NPS), as delegated by the U.S. Office of Personnel Management (OPM), is authorized to request information to determine suitability of applicants for Federal employment and non-Federal personnel proposed to work under contractor and/or agreement who require access to NPS property and/or receive a DOI Access (personal identity verification (PIV)) badges. The conduct of suitability determinations is authorizations under Executive Orders 10450, "Security requirements for Government employment" and 10577, "Amending the Civil Service Rules and authorizing a new appointment system for the competitive service"; sections 3301, 3302, and 9101 of Title 5, United States Code (U.S.C.); and parts 2, 5, 731, and 736 of Title 5, Code of Federal Regulations (CFR), and Federal information processing standards. Section 1104 of Title 5 allows OPM to delegate personnel management functions to other Federal agencies.

In line with new regulations mandated by the OPM and the Department of the Interior (DOI), the NPS Personnel Security Branch is utilizing the Electronic Questionnaires for Investigations Processing (E-QIP) System. As a result, electronic submission of the Standard Form 85, for suitability background investigations (NACI), or the Standard Form 85P, for Public Trust, is now required. The DOI and NPS requires all applicants for Federal employment and non-Federal personnel (contractors, partners, etc.) requiring access to NPS property and/or receive a DOI Access PIV badge to be processed for a suitability background investigation, in accordance with Executive Order 10450 and the Homeland Security Presidential Directive (HSPD-12).

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.

The National Park Service will utilize Form 10-152, "Background Clearance Initiation Request" to create E-QIP accounts necessary to initiate background investigations for all individuals requiring access to NPS property and/or receive a DOI Access (personal identity verification (PIV)) badge. Form 10-152 will be completed by applicants for Federal employment and non-federal personnel, including Federal contractors and individuals otherwise not directly employed by the Federal Government but who perform work for or on behalf of the Federal Government.

The information collected via NPS Form 10-152 includes detailed information for each proposed candidate requiring a background clearance, to include:

- Full legal name;

- Social Security Number;
- Date and place of birth;
- Country of citizenship;
- Contact phone number;
- Email address;
- Home address;
- Whether proposed candidate has ever been investigated by another Federal agency; and
- If they were investigated by another Federal agency, they must provide the name of that agency and the date of the investigation.

Additional information required on Form 10-152 for non-Federal personnel includes:

- Name of proposed candidate's company;
- Contract/agreement number; and
- Contract/agreement periods of performance.

Each data segment required to be completed on the form is necessary to create the E-QIP and DOIAccess accounts for each individual. Creation of these accounts is the first step in the process to initiate the background investigation and identity verification requirements in order to be cleared before they can be issued DOIAccess (personal identity verification (PIV)) badges.

- 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.**

The form will be available on our website in a fillable format. In addition, upon approval of the form by OMB, the form will begin the process to be automated in the new Department of the Interior's electronic Enterprise Forms System (eEFS). We will accept completed forms submitted through eEFS, electronically (encrypted) by email, or in hard copy.

- 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.**

There is no duplication. All information collected is specific to applicants for Federal employment and non-federal personnel, including Federal contractors and individuals otherwise not directly employed by the Federal Government in order to initiate the background clearance process.

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

This collection does not affect 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.**

We require this data to initiate the appropriate background clearance. Without this data, the NPS Personnel Security Branch staff will be unable to create accounts in eQIP; therefore, we could not collect the data less frequently.

- 7. Explain any special circumstances that would cause an information collection to be conducted in a manner:**
- * requiring 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 special circumstances that would cause 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 April 1, 2016, we published in the Federal Register (81 FR 18881) a Notice of our intent to request that OMB approve this information collection. In that notice, we solicited comments for 60 days, ending on May 31, 2016. We did not receive any comments in

response to that Notice.

In addition to the Federal Register notice, we consulted with nine (9) individuals familiar with this collection of information in order to validate our time burden estimate and asked for comments on the questions below.

NOTE: Despite multiple attempts to reach two of the nine individuals to solicit feedback (two emails and two phone calls), we were unsuccessful in obtaining a response from them.

Whether or not the collection of information is necessary, including whether or not the information will have practical utility; whether there are any questions they felt were unnecessary;

Comments: The respondents all responded that overall, they felt the form was concise, to-the-point, and necessary. With the exception of the respondent below commenting about the phone number, none felt the form collected any extra information other than what is required.

One respondent specifically responded that he had gone through the e-QIP process twice and reasonably felt the questions posed represent the bare minimum of personal information needed to create a user profile prior to conducting a background investigation. He further elaborated collection of the phone number was potentially non-critical information as the form already collects an additional point of contact (email). He added he never received a phone call from the e-QIP staff, only emails.

Another respondent suggested adding a checkbox field asking person filling out the form if they already have an active HSPD-12/Background Clearance. If the person responded "Yes", they also recommended changing the "Date of Investigation" field to ask for an approximate date of their investigation because they felt it was probably difficult to remember an exact date.

NPS Response/Action Taken: We feel it is important to collect the phone number in the event the email provided fails to generate contact with the individual. It gives the Personnel Security Branch staff a back-up means of contacting the individual if they do not respond to email. We changed the wording of question for individuals who may have had a clearance initiated by another Federal agency to include the words "HSPD-12 background clearance". The question already had checkboxes for the applicant to indicate yes or no so no further changes were made to that specific comment. We also added the word "Approximate" to the field labeled "Date of Investigation" to allow applicants to provide the approximate date their investigation was initiated in case they could not remember the exact dates.

The accuracy of our estimate of the burden for this collection of information;

Comments: The respondents provided times ranging from less than 4 minutes, on average, up to possibly as high as 10 minutes to fill out the "Applicant" portion of the form. One respondent indicated she is a foreign language speaker and felt it would take her as much as 15 minutes to complete the form.

NPS Response/Action Taken: No change was made. Based on the average timeframe provided by the respondents and our experience administering this collection, we feel our estimate of 7 minutes per response is appropriate.

Ways to enhance the quality, utility, and clarity of the information to be collected;

Comments: All respondents indicated they felt the form was easy to understand and to fill out. One respondent indicated they felt the information regarding the requirement to complete the OF-306 was prominent and hard to miss. Another respondent appreciated the use of a checkbox to denote the US as the country of citizenship and assumed most form fillers will utilize this feature. He furthermore commented that if the form was automated, it would be nice to introduce time-saving features such as having the zip code populate the state and city boxes automatically.

One respondent asked to have the form include a check list of the documents needed and added that it would be easier to have a check list or a diagram included.

NPS Response/Action Taken: We will work with the form developers to adopt the suggestion about auto-populating the city and state based on the zip code entered by the applicant once the form is approved by OMB. We did not adopt the suggestion of adding a check list of documents because the only other document needed is the OF-306 which is clearly annotated at the top of the document.

And

Ways to minimize the burden of the collection of information on respondents.

Comments: The respondents felt the information gathered by the NPS is minimal and basic with no negative effects on the respondents.

NPS Response/Action Taken: One respondent indicated it would be helpful to have a way for the applicants to track the background check process, making it clear where they are in the process. Although this comment was not directly related to the form, the Personnel Security Branch has taken this comment under advisement and will provide applicants with contact information where applicants can find out the status of their eQIP application.

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

We do not provide 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.

We do not provide any assurance of confidentiality. The information is protected in accordance with the Privacy Act, and we will maintain the information in a secure system of records (Interior-DOI-45, "Personnel Security Files – Interior", 47 FR 11036).

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 do not ask questions of a sensitive nature.

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 used Bureau of Labor Statistics News Release, dated September 8, 2016 (USDL 16-1808), Employer Costs for Employee Compensation - June 2016 (<http://www.bls.gov/news.release/pdf/ecec.pdf>), to calculate the total annual burden. Table 1 lists the hourly rate for all workers \$34.05, including benefits.

We estimate that we will receive 6,500 annual responses totaling 758 annual burden hours. We estimate the dollar value of the burden hours is \$25,810 (rounded) (6,500 x 34.05). We believe our estimate of 7 minutes to complete an application reflects the average time to complete an application, including time for reviewing instructions, gathering and maintaining data, and completing and reviewing the form.

Activity	Number of Annual Responses	Completion Time per Response (Minutes)	Total Annual Hours	Hourly Rate with Benefits	\$ Value of Annual Burden Hours
NPS Form 10-955 "Background Clearance Initiation Request"	6,500	7	758	\$34.05	\$25,809.90

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.

There are no nonhour burden 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.

The annual cost to the Federal Government to administer this information collection is approximately \$954,005 (rounded) (6,500 applications * \$146.77 (weighted average from below).

To determine hourly wage rates, we used the Office of Personnel Management Salary Table 2016-RUS (https://www.opm.gov/policy-data-oversight/pay-leave/salaries-wages/salary-tables/pdf/2016/RUS_h.pdf) as an average nationwide rate. The benefits rate was obtained from Bureau of Labor Statistics News Release, dated September 8, 2016 (USD L 16-1808), Employer Costs for Employee Compensation - June 2016 (<http://www.bls.gov/news.release/ecec.pdf>).

Position	Hourly pay rate	Hourly rate including benefits (1.57 x hourly rate)	Time Spent on Collection	Weighted average	Number of Positions	Total Cost to the Gov't per Submission
Security Officer GS-14/05	\$54.19	\$85.08	15%	\$12.76	1	\$12.76
Human Resource Specialist GS-11/05	32.17	50.51	100%	50.51	1	50.51
Security Specialist GS-09/05	26.59	41.75	100%	41.75	2	83.50
Cost per Submission						\$146.77

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

Existing collection in use without an OMB Control Number.

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 do not publish this information.

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 forms and other appropriate materials.

18. Explain each exception to the certification statement.

There are no exceptions to the certification statement.