

**SUPPORTING STATEMENT FOR VA FORM 0120 VA POLICE OFFICER
PRE-EMPLOYMENT SCREENING CHECKLIST
(2900-0524)**

A.
JUSTIFICATION

1. It is the policy of the Department of Veterans Affairs (VA) that no person be employed as a VA police officer who has been convicted of a serious crime or has a history that reflects disregard for laws and regulations, questionable character, or a pattern of misconduct or poor work habits. Pre-employment screening for VA police officers and full verification of qualifications and suitability has been a long-standing policy. Audits by the VA Office of Inspector General conducted in 1987 - 1988 revealed deficiencies in the implementation of the VA's pre-employment suitability and qualification verification practices nationwide. Individuals with criminal records, applicants not meeting OPM/VA qualification standards, or applicants with poor to unsatisfactory work experience were hired as VA police officers. Accurate recording of required pre-employment screening procedures would have revealed the disqualifying conditions. The VA Form 0120, VA Police Officer Pre-employment Screening Checklist, involves thorough pre-employment screening and special background checks for police officer applicants. It also provided a record of pre-employment screening in conformance with selection standards that ensure that Federal criminal law enforcement authority is granted cautiously and responsibly.
2. Each VA medical center has the authority to hire its own VA police officers. Prior to employment of a qualified applicant, each facility is required to conduct an FBI arrest record inquiry and to contact listed former employers for a determination of any adverse performance or suitability information. The VA Form 0120 is completed by each VA facility human resources office and serves as a record of pre-employment screening to determine the qualifications and suitability of the applicant. The office of the Deputy Assistant Secretary for Security and Law Enforcement in VA Central Office reviews each completed form and authorizes the VA Medical center to either proceed with hiring the individual, or deem the individual unacceptable to be a VA Police Officer due to items revealed during the FBI Criminal History check. If the VA Form 0120 completed by each VA facility human resources office and a determination the qualifications and suitability of the applicant are acceptable. The office of the Deputy Assistant Secretary for Security and Law Enforcement in VA Central Office will authorize the VA Medical Center to secure a seat in the next VA Basic Police Officer Course as long as all other requirements set forth by the Department of Veterans Affairs (VA) are satisfactorily accomplished. This form serves as a standard means of ensuring the appropriate completion of the pre-employment process.
3. The information technology is not feasible because the data required to complete the VA Form 0120 consists of arrest record checks accessed through the automated FBI criminal justice records system and telephonic queries to previous employers.
4. OPM conducts a post-appointment Minimum Background Investigation on all police hired; however, the completion of the pre-employment screening checks needs to be accomplished because of the extended time period required by OPM to complete the background investigation. This is the first official record maintained by each facility and VA Central Office that documents the collection of pre-employment screening information. No other information is available, other than that collected for the VA Form 0120, that can be used or modified for the purposes described in #2 above.

5. Approximately 25% of the collection of information involves small business or other small entities. Since requests are done telephonically, the burden is less than that caused by providing a written response. No other method is used for conducting a discussion of a supervisor's view of an applicant.
6. If the collection of the information were to be done less frequently it would render the pre-employment policy and structure ineffective. A return to deficient pre-employment screening and recording conditions would ensue.
7. There are no special circumstances requiring that the collection be conducted in any manner inconsistent with 5 CFR 1320.6 guidelines.
8. The agency notice was published in the Federal Register /Vol. 81, No. 229 /Tuesday, November 29, 2016, at page 86073. There were no comments received.
9. No payments or gifts to respondents have been made under this collection of information.
10. This office complies with the provisions of the Privacy Act of 1994 (5 U.S.C., 522a). Assurances of confidentiality are provided in the system of records identified as "Personal Investigation Records, OPM/Central 9."
11. There are no questions of a sensitive nature.
12. Estimates of Information Collection Burden:
 - a. Number of respondents is estimated at 1,500 per year.
 - b. Frequency of response is one time, at an average time of 10 minutes.
 - c. Annual burden is 250 hours.
 - d. Annual cost to respondents is \$3,750 (250 hours X \$15.00 per hour).
13. This collection does not involve a record keeping cost burden to respondents.
14. Cost to the Federal Government:

Processing/analyzing Cost Estimate (500 forms x 12 minutes to fill out at field facilities X GS 9/5* @ (\$27.37/hour = \$2,737) + (500 forms x 10 minutes to review and verify at the VA LETC X GS 9/5* @ \$27.37/hour = \$2,280.83) + (500 forms X 5 minutes to review at Central Office X GS 7/5* @ \$19.91/hour = \$974.17) + (500 forms X \$.50 per NCIC check transaction = \$250)

Publication Cost per 100 forms = \$29.00. Total cost for 500 forms = \$145

Total Cost to Government = \$6,387
15. There is no change in burden.
16. The information collected is not for publication or statistical use.
17. Not applicable.

18. This submission does not contain any exceptions to the certification statement.

B. COLLECTION OF INFORMATION EMPLOYING STATISTICAL METHODS

This data collection does not employ statistical methods.