

Supporting Statement for Information Collection Submission
OMB Control Number 3090-0283
Contractor Information Worksheet

A. Justification

1. Explain the circumstances that make the collection of information necessary.

Information collected through the Contractor Information Worksheet is necessary to meet:

- The Office of Management and Budget (OMB) Guidance M-05-24 for Homeland Security Presidential Directive (HSPD) 12 which authorizes Federal departments and agencies to ensure that contractors have limited/controlled access to facilities and information systems, and
- GSA Directive CIO P 2181.1 Homeland Security Presidential Directive-12 Personal Identity Verification and Credentialing which states that GSA contractors must undergo a minimum of a FBI National Criminal Information Check (NCIC) to receive unescorted physical access.

GSA requires the collection of the information in the Contractor Information Worksheet to authorize and initiate background check requests for GSA contractors and to obtain a GSA Access Card. The background checks are carried out by the Office of Personnel Management, Facilities, Security & Contracting-Personnel Security (OPM FSC) and the credentialing process is carried out by the GSA's Managed Service Office (MSO) in accordance with the terms and conditions of separate Memoranda of Agreement (MOAs).

The Office of Management and Budget (OMB) Guidance M-05-24 for Homeland Security Presidential Directive (HSPD) 12 authorizes Federal departments and agencies to ensure that contractors have limited/controlled access to facilities and information system. According to GSA policy as documented in GSA Directive CIO P 2181.1 Homeland Security Presidential Directive-12 Personal Identity Verification and Credentialing, GSA contractors must undergo a minimum of a FBI National Criminal Information Check (NCIC) to receive unescorted physical access and/or logical access to GSA-controlled information systems.

According to GSA policy, contractors (as described above) that are significantly distant from a MSO credentialing stations to obtain digital fingerprints must submit two (2) sets of fingerprints on SF-87 for exception cases.

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.

The GSA requesting official, referred to as "Sponsor," collects and inputs the Contractor Information Worksheet data into the GSA Credential and Identity Management System (GCIMS). GSA Office of Mission Assurance (OMA) Identity, Credential and Access Management (ICAM) Division then uploads the relevant contractor data from GCIMS to the OPM e-QIP system for initiation of the contractor background investigation process.

GCIMS automatically send relevant data to the MSO for enrollment, including digital fingerprints for investigation and GSA Access Card if needed. The OPM FSC performs the required background checks for GSA contractors once the contractor completes the e-QIP and fingerprinting process. The requesting official is responsible for requesting the investigation and/or GSA Access Card. Often the GSA requesting official is the Contracting Officer's Representative (COR) for the contract, but this role may be fulfilled by a project manager, Public Buildings Service (PBS) building manager, or local Access Card Point of Contact (POC) as appropriate.

If the contractor has a prior background check, OPM FSC uses the information in e-QIP to verify the prior determination. When OPM FSC makes an access determination, they notify OMA ICAM Division. ICAM Division will input the results into GCIMS and notify contractor, GSA sponsor, GSA POCs, and contractor's vendor company point of contact.

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.

Currently the only way to collect information is by having the applicant complete the form using black or blue ink or by typing the data in the form and then submitting it. GSA is working to pursue an automated way to receive the information required in the form through the GSA Credential and Identity Management System (GCIMS).

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 information provided on the Contractor Information Worksheet related to an individual contractor is needed to identify the individual and contact them as part of the background check processing by OPM FSC and credentialing by the MSO. The Contractor Information Worksheet has some common data fields with Form SF-87, used to capture fingerprints for the Department of Justice Federal Bureau of Investigation (FBI). It is needed in order to conduct a FBI National Crime Information Check (NCIC), also known as the fingerprint check and with two supplemental forms: Optional Form (OF) 306 and GSA Form 3665. In addition, the Contractor Information Worksheet requires information that is not collected on SF-87, OF 306, and GSA Form 3665. The information not collected on those forms is required to tie contractors to GSA contracts, buildings, identifying vendor's POC information, notifying applicants concerning authority to collect background check related information, Privacy Act routine uses, and final determination.

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

The collection of information does not pose a significant burden on 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.

Collection of this information is necessary for GSA contractors to be granted access and work in GSA controlled facilities and obtain a GSA Access Card. Without the specific information on the Contractor Information Worksheet, OPM would not be able to identify and contact the individual and conduct the appropriate background check, thus affecting GSA's ability to hire contractors to meet the objectives of the OMB HSPD-12 guidance and GSA's overall security posture. Any alteration of the information to be collected on the Contractor Information Worksheet must be consistent with the terms of agreement in the current Memoranda of Agreement (MOAs) between GSA and OPM and MSO.

7. Explain any special circumstances.

If OPM FSC identifies any determination issues during the background check, OPM FSC would contact the contractor directly to address those issues. The contractor would then have 15 days to respond to inquiries made by OPM FSC. If the contractor failed to submit security documents or respond completely to inquiries made by the OPM FSC within 15 calendar days, the applicant would no longer be considered for an unescorted access determination and the GSA requesting official, contractor, and contracting company will be notified of this decision in writing.

If the result for a contractor's investigation determination is unfavorable, OPM FSC would provide a written notification to the contractor identifying the specific reasons for proposing to deny the contractor's participation in the contract due to the unfavorable determination if needed. OPM FSC notifies GSA OMA ICAM Division. ICAM Division will input the results into GCIMS and notify the contractor, GSA sponsor, GSA POCs, and contractor's vendor company point of contact of the unfavorable determination.

8. Describe efforts to consult with persons outside the agency.

A 60-day notice was published in the *Federal Register* at 80 FR 75864, on December 4, 2015. No comments were received. A 30-day notice was published in the *Federal Register* at 81 FR 20639 on April 8, 2016. No comments were received.

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

Not applicable.

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

The Contractor Information Worksheet includes a Privacy Act Notice in compliance with the Privacy Act of 1974, and as authorized by the Federal Property and Administrative Services Act of 1949. The entire notice states: In compliance with the Privacy Act of

1974, the following information is provided: Solicitation of information contained herein may be used as a basis for physical access determinations. GSA describes how your information will be maintained in the Privacy Act system of record notice published in the Federal Register at 73 FR 35690 on June 24, 2008. Your social security number is being requested pursuant to Executive Order 9397. Disclosure of the information by you is voluntary. Failure to provide information requested on this form may result in the government's inability to grant unescorted physical access to GSA-controlled facilities and may affect your prospects for employment or continued employment under a government contract, or at a Federal facility, or with a government license.

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.

GSA requires the sensitive questions be answered in the Contractor Information Worksheet to authorize and initiate background check requests for GSA contractors and to obtain a GSA Access Card. The background checks are carried out by the Office of Personnel Management, Facilities, Security & Contracting-Personnel Security (OPM FSC) and the credentialing process is carried out by the GSA's Managed Service Office (MSO) in accordance with the terms and conditions of separate Memoranda of Agreement (MOAs).

Sensitive information collected through the Contractor Information Worksheet is necessary to meet:

- The Office of Management and Budget (OMB) Guidance M-05-24 for Homeland Security Presidential Directive (HSPD) 12 which authorizes Federal departments and agencies to ensure that contractors have limited/controlled access to facilities and information systems, and
- GSA Directive CIO P 2181.1 Homeland Security Presidential Directive-12 Personal Identity Verification and Credentialing which states that GSA contractors must undergo a minimum of a FBI National Criminal Information Check (NCIC) to receive unescorted physical access.

12. Provide estimates of the hour burden of the collection of information.

The estimated number of respondents annually is 25,000 contractors, with each respondent requiring .25 hours to complete the form, for a total of 6,250 hours. The estimate of 25,000 respondents is based on an average of the estimated number of respondents for FY12-FY15. GSA projects that 25,000 contractors will be investigated by OPM FSC using the form.

The majority of contractors investigated by OPM FSC are Public Buildings Services (PBS) contractors. The average hourly wage rate for PBS contractors is \$39.78. The annualized cost of burden hrs to respondents was calculated by multiplying average hourly wage rate for PBS contractors to estimated total burden hrs to respondents per year.

Total Annual Requests.....25,000

Frequency of Response.....	x	<u>1</u>
Estimated Hours/Response.....		.25
Estimated Total Burden Hours/Year.....		6,250
Average Cost/hour.....	x	<u>\$39.78</u>
Annualized cost of burden hrs to respondents.....		..\$248,625

Note: There will be no increase in the burden to the public. This information being collected on the Contractor Information Worksheet is the same information that was collected by the Federal Protective Service 176 Form used previously.

13. Provide an estimate for the total annual cost burden to respondents or recordkeepers resulting from the collection of information.

Since Contractor Information Worksheet respondents do not have to record or maintain the information provided, there is no cost to the respondents except for the hours cited in Item 12.

14. Provide estimates of annualized costs to the Federal Government.

The estimated burden hours to the Federal Government are 4,000 hours annually. Reviewing and processing each response should take approximately .16 hours; the total number of responses is estimated to be 25,000 contractors each year (25,000 responses x .16 hour = 4,000 hours).

The estimated cost of Contractor Information Worksheet reviews to the Government is based on the 4,000 burden hours to the Government, using the 2014 annual cost of a Government Program Analyst, grade 11, step 5, paid \$71,504 annually (not including locality adjustment): \$34.37 per hour x 4,000 hours = \$137,480.

15. Explain the reasons for any program changes or adjustments reported.

A request is being submitted to OMB for a non-substantive change regarding the Contractor Information Worksheet. The header on number 2 of the worksheet will now require a GSA Requesting Official fill out the portion instead of a Contracting Officer. Also, there were unnecessary spaces on the worksheet that were removed.

A. GSA estimates an increase in annual respondents to 25,000 after looking at FY16 data, compared to historical data from FY 12-15.

B. The majority of GSA Contractor Information Worksheet users are GSA Public Buildings Service contractors. In the original information collection request, the average wage of PBS contractors was \$39.00. For this information collection request, the average wage of PBS contractors increased to an estimated \$39.78. (The annualized cost of burden hrs. to respondents was calculated by multiplying average wage rate for PBS contractors to estimated total burden hrs to respondents per year.)

C. In the original information collection request, the average cost per hr. to the government was based on the assumption that the average requesting official's is grade 11, step 5 at a cost of \$34.37 per hr. The average cost per hr. was used to calculate the total cost to the government.

16. For collections of information whose results will be published, outline plans for tabulation and publication.

The results will not be published.

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.

GSA is not seeking approval to not display the expiration date for OMB approval of the information collection.

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

There are no exceptions to the certification "Certification for Paperwork Reduction Act Submissions."

B. Collections of Information Employing Statistical Methods

This section is not applicable for the purposes of the Contractor Information Worksheet.