

Supporting Statement for Paperwork Reduction Act Submissions
Approval of an existing collection currently in use without an OMB control number for the
Address Verification/Change Form (1-797)

OMB Control # xxxx-xxxx

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.

Title 28 Code of Federal Regulations (CFR) Section 0.85(j) sets forth the Attorney General's delegation to the Director of the Federal Bureau of Investigation (FBI) to implement the exchange of criminal history information for noncriminal justice purposes enumerated in 28 CFR 20.33(a)(3) and 50.12(a). Title 28 CFR 50.12(b) contains guidelines for the dissemination of criminal history information for noncriminal justice purposes.

The Address Verification/Change Form (1-797) 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. U.S. Department of Justice Order 556-73 also known as Departmental Order establishes rules and regulations for an individual to obtain a copy of their Identity History Summary for review or challenge, or as proof that one does not exist.

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 maintains the national repository for fingerprints and criminal 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. It further stipulates that the CJIS Division has a duty to take reasonable measures to maintain accurate records.

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The 1-797 provides the requester with the ability to notify the FBI of any address changes that occur after the submission of a request for Identity History Summary and to provide the requester with the ability to verify the correct address was submitted.

3. Use of Technology:

Currently, the form is housed in electronic format at www.fbi.gov/checks as a fillable form. Customers, after completing the form, may save it and send via email or print it and send via facsimile.

4. Efforts to Identify Duplication:

The FBI is the only federal repository 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:

The customer's response could be sent to their old address, which may result in the customer not receiving their response, or it could result in a Personally Identifiable Information (PII) breach as the customer's information could potentially be seen or used by the current resident.

7. Special Circumstances Influencing Collection:

The 1-797 submissions are collected and processed as necessary. All stored identity history summary information is inclusive only of that information provided by a submitting individual.

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 was published in the Federal Register and 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	720
Frequency of response	as needed
Total annual responses	720
Minutes per response	2 minutes
Annual hour burden	24 hours

The number of respondents is the total Address Verification/Change request forms received yearly (estimated 60 responses per month multiplied by 12 months = 720). The total annual responses (estimated 60 responses per month multiplied by 12 months = 720). The annual hours of burden is calculated by multiplying the total annual (720) responses by 2 minutes and dividing by 60 minutes in one hour.

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 1-797 forms are received and processed by the same personnel. The annualized costs provided below for the Analysis and Conversion is incorporated in the cost of personnel salaries.

Personnel Salaries:	\$ 849.60
Analysis of incoming information:	\$ 12,772.80
Conversion to electronic format:	\$ 424.80
Total Cost:	\$ 14,047.20

\$849.60 (Receiving the hard copy form involves taking the form off of the facsimile machine or

printing it from email, each of which are estimated to take approximately 2 minutes. Based on the average salary of a GS 10 Step 5 and a GS 8 Step 5 plus 33% comp and benefits, hourly wage

was calculated at \$35.48. Receiving each form would cost approximately \$1.18 per form times 720 forms equals \$849.60 per year.) Note: Cost could not be determined utilizing the Activity-Based Management (ABM) Costing Model.

\$12,772.80 (The time to process/analyze each form is estimated at 30 minutes per form. Based on the average salary of a GS 10 Step 5 and a GS 8 Step 5 plus 33% comp and benefits, hourly wage was calculated at \$35.48. Processing/analyzing each form would cost approximately \$17.74 per form times 720 forms equals \$12,772.80 per year.) Note: Cost could not be determined utilizing the Activity-Based Management (ABM) Costing Model.

\$424.80 (The time to convert hard-copy into electronic format is estimated at 1 minute per form. Based on the average salary of a GS 10 Step 5 and a GS 8 Step 5 plus 33% comp and benefits, hourly wage was calculated at \$35.48. Converting each form would cost approximately \$.59 per form times 720 forms equals \$424.80 per year.) Note: Cost could not be determined utilizing the Activity-Based Management (ABM) Costing Model.

15. Reasons for Change in Burden:

This is a new form necessary for the customers to correct or verify the address submitted with their Departmental Order 556-73 request.

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.