

**Department of
Veterans Affairs**

Memorandum

Date: October 25, 2016

From: Cynthia Harvey-Pryor, Acting VA PRA Clearance Officer
on behalf of the VA Office of Security and Law Enforcement

Subject: Request for OMB review and consideration of emergency clearance for "VA Police Officer Pre-Employment Screening Checklist" data collection

To: Stephanie Tatham, Office of Management and Budget (OMB)
Desk Officer for Veterans Affairs

1. The Department Of Veterans Affairs, Office of Security and Law Enforcement, Law Enforcement Training Center (LETC), is seeking an emergency clearance to extend data collection: 2900-0524: VA Police Officer Pre-Employment Screening Checklist The data collection is titled, VA Police Officer Pre-Employment Screening Checklist.

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. 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.

- I. **Data collection is needed prior to the expiration of time periods established in this Part; and**

The collection of information covered in this submission is needed for reinstatement and emergency clearance of the OMB control number. The current expiration has preceded the allotted time for normal OMB review.

- II. **Data collection is essential to the mission of the agency**

The data collection is considered essential to the VA mission. 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, which can be used or modified for the purposes described.

2. The agency cannot reasonably comply with the normal clearance procedures under this Part because:

I. The use of normal clearance procedures is reasonably likely to prevent or disrupt the collection of information.

The data collection was submitted for an Emergency Extension of the OMB clearance number, however, the request was expedited and the collection request expired in ROCIS before the Desk Officer could act upon it. As there is no designated PRA Liaison for their program, the Office of Security and Law Enforcement representative for this data collection was under the assumption that the outgoing VA Clearance Officer had submitted the collection request on their behalf for the 3-year renewal process.

II. Public harm is reasonably likely to result if normal clearance procedures are followed;

Without the pre-employment suitability in place, the possibility of hiring of individuals with criminal records, applicants not meeting OPM/VA qualification standards, or applicants with poor to unsatisfactory work experience could lead to misrepresentational hiring of VA police officers. 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.

(a) The agency shall state the time period within which OMB should approve or disapprove the collection of information.

VA is requesting to extend the data collection period for an additional 4 to 6 months (November 2016 until March 1, 2017). Following emergency approval, VA will immediately and appropriately submit the 60 and 30-day Federal Register Public Comment period notices in requesting the 3 year clearance under the Paperwork Reduction Act.

Thank you for your consideration of this important matter,

Respectfully,



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