

Subject: Request for Non-Substantive Change to the INV 100

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Date: September 8, 2017

The Freedom of Information / Privacy Act Record Request Form, INV 100, is an information collection completed by individuals submitting Freedom of Information Act (FOIA), Privacy Act, and Amendment record requests to OPM's NBIB, FOI/PA office. OPM's NBIB FOI/PA office utilizes the optional form INV 100 to standardize collection of data elements specific to the types of record requests. Current record requests can be submitted to NBIB FOI/PA in a format chosen by the requester. Often, requests are missing data elements which require contact with the requester, thereby adding time to the process. Standardization of the process will increase the volume of perfected requests received and strike an appropriate balance between the burden to the public in submitting a request and NBIB FOI/PA being able to fulfill FOIA, Privacy Act, and Amendment requests in an efficient manner.

OPM proposes no substantive changes to the INV 100.

OPM proposes three non-substantive changes to the INV 100. The current form names OPM Federal Investigative Services. OPM proposes replacement of all references to the Federal Investigative Services with the National Background Investigations Bureau. The revision date will be changed from September 2015 to Revised July 2017. OPM also proposes a change on page 3 to the Privacy Act statement.

Pursuant to 5 U.S.C. § 552a(e)(3), the portion of the Privacy Act statement defining the routine uses is being revised consistent with the guidance in OMB Circular A-108, which allows for a plain-language summary of the routine uses and a link to the website where the full list of routine uses is available.

**Privacy Act Statement.** Information provided by a requester will be used to locate and provide the requester responsive records pursuant to the Freedom of Information Act (5 U.S.C. § 552), and/or the Privacy Act of 1974 (5 U.S.C. § 552a). Authority to collect this information is contained in 5 U.S.C. § 552, 5 U.S.C. § 552a, 5 C.F.R. § 297.201(b). The purpose of the collection is to enable the United States Office of Personnel Management (OPM), **National Background Investigations Bureau (NBIB)** to locate applicable records and to respond to requests made under the Freedom of Information Act and the Privacy Act of 1974. Failure to provide the required information may result in no action being taken on the request.

**Routine Uses.** The information collected on this form will primarily be used to comply with requests for information under 5 U.S.C § 552 and 5 U.S.C § 552a. The information requested on this form may be used by and disclosed to OPM NBIB personnel, contractors, and/or shared externally with other government agency personnel as a routine use when necessary and relevant to assist in activities related to the processing of your Freedom of Information Act and/or Privacy Act request. Additionally, OPM NBIB may use the information as necessary and authorized by the routine uses in the system of records notice associated with this form: OPM Central 8, Privacy Act/Freedom of Information Act (PA/FOIA) Case Records. A complete list of the routine uses and the full text of OPM Central 8 can be found at: <https://www.opm.gov/information-management/privacy-policy/sorn/opm-sorn-central-8-privacy-actfreedom-of-information-actpafoia-case-records.pdf>