

## SUPPORTING STATEMENT - PART A

(OMB Control Number: 0704-0522)

### 1. Need for the Information Collection

The Pentagon Force Protection Agency requires collection of information from members of the public during the course of investigating criminal or suspicious activity incidents and medical responses in order to positively identify respondents and collect information pertinent to the medical assistance and investigation and/or criminal prosecution of persons involved. This information can include an individual's Social Security Number (SSN) to differentiate him/her from another person with the same name and birthdate. PFPA is denoted a law enforcement agency under DODD 5105.68, section 4 "PFPA shall provide force protection, security, and law enforcement to safeguard personnel, facilities, infrastructure, and other resources for the Pentagon Reservation and for assigned DoD activities and DoD-occupied facilities within the National Capital Region (NCR)". The requirements for recording incident events and the use of a software-based records management system are described at length in the National Fire Protection Association (NFPA) Standard 1221-2013. The acceptable collection of SSN's by law enforcement agencies for interoperability with organizations beyond the Department of Defense or operational necessities are stated in DODI 1000.30, August 1, 2012

### 2. Use of the Information

Responders will use this actionable information to make time-critical decisions and support operations and exchange of data across responder Directorates. The Police Dispatch and Investigatory Records System will be used to develop reports on groups and individuals that have harmed, or have attempted harm; made direct or indirect threats; have a specific interest in OSD High Risk Personnel, the DoD workforce, or the Pentagon Facilities; or have engaged in organized criminal activity such as gangs, drugs, and illegal immigration that would impact the Pentagon Facilities.

Data is input directly into the database by PFPA Pentagon Police Department (PPD), Response, and Dispatch personnel, as it has been input into the former Incident and Criminal Information System (ICIS) for the last decade. The application provides open text fields and drop-down options for inputting non-standard and standard data, respectively. Only PFPA personnel with an active Police Dispatch and Investigatory Records System account and DoD-issued Common Access Card (CAC) can access the data and update reports. All modifications to reports are tagged with a date/time stamp and the PFPA personnel's identity.

These reports are maintained for the period of time allowed by their disposition, then discarded. Each record is assigned an expiration date once closed. Non-criminal records are discarded from the database (i.e., destroyed) one year after the case is closed. Criminal records are cut off when a case is closed and files, both electronic and hard copies, are destroyed 15 years after the cut-off. While active, these reports may be used in an investigation or as part of a case report submitted to the courts. Upon request, this data may be submitted to a vetted 3rd party such as an insurance agent or other law enforcement agency.

### 3. Use of Information Technology

Only PFPA personnel (e.g., responders, dispatchers, PPD) interface with the Police Dispatch and Investigatory Records System to initiate and input dispatch calls and data into reports in support of their mission to provide security for the Pentagon and its leased facilities. Records can be directly retrieved by PFPA personnel using a respondent's First/Last Name, SSN, or incident # and viewed on the workstation's monitor, which reduces manpower needs to locate records and paper to view reports. During the report approval process, Supervisors sign or push back a report electronically; eliminating the need to print a draft report pre-approval. Information can be redacted using the system, eliminating the need to print, redact, scan, and re-print each report. Additionally, the reports can be readily accessed, searched, and reviewed or updated concurrently by multiple PFPA personnel involved in the incident, thereby reducing the time and manpower resources required to complete the reporting and modification processes.

### 4. Non-duplication

The information obtained through this collection is unique and is not already available for use or adaptation from another cleared source.

### 5. Burden on Small Businesses

This information collection does not impose a significant economic impact on a substantial number of small businesses or entities.

### 6. Less Frequent Collection

All data collected in the Police Dispatch and Investigatory Records System by PFPA personnel result from daily medical, criminal, and suspicious activities occurring on the Pentagon and its leased facilities by PFPA personnel directly involved in the incidents. Daily investigation of incidents and resulting data collection must be accomplished by PFPA or PFPA would be less able to complete its mission to provide force protection, security, and law enforcement to safeguard personnel, facilities, infrastructure, and other resources for the Pentagon Reservation and for assigned DoD activities and DoD-occupied facilities within the NCR. Data from members of the public is collected only by PFPA PPD Officers as incidents occur and the frequency is not under the control of any PFPA personnel.

### 7. Paperwork Reduction Act Guidelines

This collection of information does not require collection to be conducted in a manner inconsistent with the guidelines delineated in 5 CFR 1320.5(d)(2).

### 8. Consultation and Public Comments

#### Part A: PUBLIC NOTICE

A 60-Day Federal Register Notice for the collection published on Wednesday, August 16, 2017. The 60-Day FRN citation is 82 FRN 38899.

A 30-Day Federal Register Notice for the collection published on Thursday, November 30, 2017. The 30-Day FRN citation is 82 FRN 56819.

#### Part B: CONSULTATION

No additional consultation apart from soliciting public comments through the 60-Day Federal Register Noticed was conducted for this submission.

9. Gifts or Payment

No payments or gifts are being offered to respondents as an incentive to participate in the collection.

10. Confidentiality

In the event a PFPA PPD Officer collects information from a member of the public while on duty with the intent of inputting the data into the Police Dispatch and Investigatory Records System application, the PFPA PPD Officer will verbally provide the individual the PFPA Privacy Act Statement and Agency Disclosure Notice. The verbiage provided is:

PRIVACY ACT STATEMENT

Authority: 10 U.S.C. 2674, Operation and Control of Pentagon Reservation and Defense Facilities in National Capital Region; DoD Directive 5105.68, Pentagon Force Protection Agency (PFPA); Administrative Instruction (AI) 30, Force Protection on the Pentagon Reservation; and E.O. 9397, as amended.

Principle Purpose: For Pentagon police to create and maintain incident records that inform time-critical decisions and support their mission to provide security for the Pentagon and its leased facilities.

Routine Uses: Records contained herein may specifically be disclosed outside the DoD as a routine use pursuant to 5 U.S.C. 552a(b)(3) for use in an investigation or to a Federal, state, local, or foreign agencies that administer programs or employ individuals involved in an incident or inquiry. Additional routine uses are available in the applicable system of records notice, DPFPA 05, Computer Aided Dispatch, Records and Case Management System (CAD-R/CMS); available at: <http://dpcl.d.defense.gov/Privacy/SORNsIndex/DOD-wide-SORN-Article-View/Article/570774/dpfpa-05/>

Disclosure: Voluntary, however, if the requested information is not provided the individual may be subject to arrest if a criminal act has occurred. Once in custody, disclosure is voluntary and non-disclosure notated in the arrest record.

AGENCY DISCLOSURE NOTICE

The public reporting burden for this collection of information is estimated to average 20 minutes per response, including the time for reviewing instructions, searching existing data sources, gathering and maintaining the data needed, and completing and reviewing the collection of information. Send comments regarding this burden estimate or any other aspect of this collection of information, including suggestions for reducing the burden, to the Department of Defense, Washington Headquarters Services, Executive Services Directorate, Information Management Division, 4800 Mark Center Drive, East Tower, Suite 02G09, Alexandria, VA 22350-3100 (The OMB Control Number is 0704-0522).

Notwithstanding any other provision of law, no person shall be subject to any penalty for failing to comply with a collection of information if it does not display a currently valid OMB control number.

A draft copy of the SORN [DPFPA-05 Police Dispatch and Investigatory Records System] has been provided with this package for OMB's review.

A draft copy of the PIA, Police Dispatch and Investigatory Records System, has been provided with this package for OMB's review.

Non-criminal records are destroyed one year after case is closed.

Criminal records are cut off when a case is closed. Files are destroyed 15 years after the cut-off.

#### 11. Sensitive Questions

The data collected by PFPA personnel includes information relevant only to the respondent(s) involved in the incident and actions observed and executed by PFPA personnel, although some of the information, e.g., race and ethnicity, is considered to be sensitive. In addition, SSN is collected from respondents, and an SSN justification is included as part of this submission package. Information not relevant to the investigation of an incident is not collected.

#### 12. Respondent Burden and its Labor Costs

#### 13. Respondent Costs Other Than Burden Hour Costs

There are no annualized costs to respondents other than the labor burden costs addressed in Section 12 of this document to complete this collection.

#### 14. Cost to the Federal Government

##### a. Labor Cost to the Federal Government

##### 1. **[Cases]**

- a. Number of Total Annual Responses: 1000
- b. Processing Time per Response: 0.3 hours
- c. Hourly Wage of Worker(s) Processing Responses : \$38.00
- d. Cost to Process Each Response: \$3.80
- e. Total Cost to Process Responses (*P: A multiplied by B multiplied by C*): \$11,400

##### **[Incidents]**

- a. Number of Total Annual Responses: 20,000
- b. Processing Time per Response: 0.08 hours
- c. Hourly Wage of Worker(s) Processing Responses : \$38.00
- d. Cost to Process Each Response: \$3.80
- e. Total Cost to Process Responses: \$60,080

##### **2. Overall Labor Burden to Federal Government**

- a. Total Number of Annual Responses: \$21,000
- b. Total Labor Burden: \$72,000

b. Operational and Maintenance Costs

- a. Equipment: \$50,000/yr
- b. Printing: \$0
- c. Postage: \$0
- d. Software Purchases: \$0
- e. Licensing Costs: \$375,000/yr
- f. Other: \$0
- g. Total: \$425,000

- 1. Total Operational and Maintenance Costs: \$425,000
- 2. Total Labor Cost to the Federal Government: \$72,000
- 3. Total Cost to the Federal Government: \$497,000

15. Reasons for Change in Burden

The burden has decreased since the previous approval because the original submittal included one-time purchase costs.

16. Publication of Results

The results of this information collection will not be published.

17. Non-Display of OMB Expiration Date

We are not seeking approval to omit the display of the expiration date of the OMB approval on the collection instrument.

18. Exceptions to "Certification for Paperwork Reduction Submissions"

We are not requesting any exemptions to the provisions stated in 5 CFR 1320.9.