

Department of Justice
Bureau of Alcohol, Tobacco, Firearms and Explosives
1140-0058
Supporting Statement – Information Collection Requirement
ATF F 8620.7
Investigator Integrity Questionnaire

A. Justification

1. Necessity of Information Collection

Pursuant to a Memorandum of Understanding, hereinafter referred to as an MOU, between the Office of Personnel Management (OPM) and the Bureau of Alcohol, Tobacco, Firearms and Explosives (ATF), dated March 3, 2000, ATF has been authorized to use contract investigators and/or its own investigative employees to conduct background investigations. Personnel security and suitability background investigations and periodic reinvestigations on applicants for, or employees in, competitive service positions must be conducted in accordance with National Security Directive 63. Each investigator conducting ATF personnel security and suitability investigations must themselves be investigated and must have a favorably adjudicated Single Scope Background Investigation (SSBI)/T5 that meets the OPM requirements of that investigation, as implemented by Executive Order 12968, preceding their performing under this delegation. ATF must certify that each investigator performing under the MOU is screened by an investigation that meets no less than OPM's current SSBI Critical-Sensitive/T5 investigative requirements. Contract investigators are required to meet the same level of background screening and rescreening as Federal employees. In accordance with the MOU, ATF must implement an "Investigator Integrity Follow-up Program" to ensure that contract investigators are conducting investigations in accordance with the minimum standards articulated in National Security Directive 63. Further, ATF must ensure that contract investigators, while performing their investigative duties, conduct themselves in such a manner as to bring credit to the United States Government.

2. Needs and Uses

ATF personnel security program managers; or their designees, will, on a random basis, solicit information, via the attached questionnaire, from persons who have been interviewed by contract investigators. The interviewee will be provided with a self-addressed, postage-paid envelope for his or her use in responding to the questionnaire. The questionnaire responses will be used to verify that contract investigators are actually interviewing the individuals that they have documented in their reports of investigation; and are following prescribed policies while conducting the interviews. Areas reviewed relating to policy requirements include scheduling an appointment in advance, advising of Privacy Act rights, properly identifying him/herself, properly conducting and documenting the interview, and displaying a professional demeanor and appearance while conducting the interview.

3. Use of Information Technology

ATF F 8620.7 is not available on the ATF website. It is mailed to, and returned by, the interviewee to one single ATF office, the Personnel Security Division (PSD). Currently, ATF does not have the capability to accept electronic submissions. For this submission, the respondent sends the completed form back to ATF via a postage-paid return envelope. However, an effort is being made to implement electronic submission capability.

4. Efforts to Identify Duplication

Similar information is not available for this information collection requirement. ATF uses a uniform subject classification system to identify duplication and to ensure that any similar information already available cannot be used or modified for use for the purpose of this information collection.

5. Minimizing Burden on Small Businesses

The collection of information has no impact on small businesses or other small entities.

6. Consequences of Not Conducting or Less Frequent Collection

ATF utilizes the services of contract investigators to conduct security/suitability investigations on prospective or current employees, as well as those contractors and consultants doing business with ATF. The use of contract investigators permits ATF to use their permanent on-board investigative resources to combat crime, rather than divert those resources to conduct personnel security/suitability investigations. This information collection is being conducted in order to ensure that the personnel security/suitability investigations are (1) conducted in such a manner as to meet the minimum standards of National Security Directive 63, and (2) conducted in such a professional manner as to reflect favorably upon the United States.

7. Special Circumstances

As submission of the information being sought is entirely voluntary on the part of the respondent, there are no circumstances that would cause the information collection to be conducted in any manner:

- Requiring respondents to report information to ATF more often than quarterly;
- Requiring respondents to prepare a written response in fewer than 30 days after receipt of the questionnaire;
- Requiring respondents to submit more than an original of any document;
- Requiring respondents to retain any records;
- Requiring the use of any statistical data;
- Requiring any pledge of confidentiality; or
- Requiring respondents to submit any proprietary or trade secrets.

8. Public Comments and Consultations

No public comments were received during both the 60-day and 30-day Federal Register notice period.

9. Provision of Payments or Gifts to Respondents

No payment or gift is associated with this information collection. ATF will not provide any monetary incentive, gift, gratuity, or other remuneration to any respondent(s).

10. Assurance of Confidentiality

Confidentiality is not assured.

11. Justification for Sensitive Questions

Questions of a sensitive nature are not asked of the respondent. However, questions concerning the behavior and degree of professionalism of the contract investigators are asked.

12. Estimate of Respondent's Burden

Each year, there are approximately 2,500 respondents associated with this information collection. Each respondent will respond one time. The total number of responses is 2,500. It is estimated that it takes 5 minutes to complete the form. The total burden for this information collection is 208 hours.

13. Estimate of Cost Burden

There is no new or annualized cost associated with this information collection.

14. Cost to Federal Government

The cost to the Federal Government is estimated at \$1,200.00. ATF does not anticipate increasing existing staffing to monitor this program, nor does it anticipate any additional equipment or supplies to administer this program.

15. Reason for Change in Burden

There are no program changes or adjustments associated with this information collection.

16. Anticipated Publication Plan and Schedule

The information collected will not be published.

17. Display of Expiration Date

ATF is not requesting approval to omit the expiration date for this information collection.

18. Exception to the Certification Statement

There are no exceptions to the Certification Statement.

B. Collection of Information Employing Statistical Methods

Yes. Please see separate Supporting Statement B.