

## SUPPORTING STATEMENT - PART A

### Personnel Security System Access Request (PSSAR) Forms –0704-0542

#### 1. Need for the Information Collection

50 U.S.C. 401, Congressional declaration of purpose; 50 U.S.C. 435, Purposes; DoD 5200.2R, Department of Defense Personnel Security Program Regulation; DoD 5105.21-M-1, Sensitive Compartment Information Administrative Security Manual; E.O. 10450, Security Requirements for Government Employment; E.O. 10865, Safeguarding Classified Information Within Industry; E.O. 12333, United States Intelligence Activities; E.O. 12829, National Industrial Security Program; and E.O. 12968, Access to Classified Information.

Personnel systems across the DoD, including the Joint Personnel Adjudication System (JPAS), the Defense Information System for Security (DISS), the Defense Central Index of Investigations (DCII), the Secure Web Fingerprint Transmission (SWFT) require personal data collection to facilitate the initiation, investigation and adjudication of information relevant to DoD security clearances and employment suitability determinations for active duty military, civilian employees and contractors seeking such credentials. These Personnel Security Systems are the authoritative source for clearance information resulting in access determinations to sensitive/classified information and facilities. The Personnel Security System Access Request (PSSAR) Form is used to collect the necessary information to vet and establish accounts for persons wishing to become users and gain access to these systems.

#### 2. Use of the Information

The collection instrument, the Personnel Security System Access Request (PSSAR) Form, is solely used for the purpose of requesting an account for JPAS, DISS, DCII, or SWFT. Work performed within the systems is covered by each systems' separate OMB Number. The PSSAR collection instrument's targeted respondents are Facility Security Officers (FSOs) who work in industry companies and not in the DoD. These FSOs require access for the purpose of facilitating the initiation, investigation and adjudication of information relevant to DoD security clearances and employment suitability determinations for contractors seeking such credentials. Each respondent is required to have a completed PSSAR on file at all times to remain compliant with the account request procedures for all of these systems.

The PSSAR Form is published and available on the DoD Forms website located at <http://www.esd.whs.mil/Directives/forms/>. However, respondents generally retrieve this form at the Personnel Security Assurance (PSA) website (<https://psa.dmdc.osd.mil/psawebdocs/>) which hosts announcements, policy documentation, and relevant links to JPAS, DISS, DCII, and SWFT. A respondent will retrieve this form from the links above, complete it with their personal information, desired system access and relevant training requirements. Upon their signature, the form is signed by their nominating official and validating official to show both the need for access and the proper clearance level. Upon the completion of the form, it is passed encrypted to

the government through the DMDC Customer Contact Center who validate the completion of the form and in turn create the accounts in the respective systems. The completed PSSAR form must be retained as it may be requested later during audits or compliance checks.

During the coming three years, the JPAS system will be sunset and replaced by DISS before being retained as a legacy system. As both systems must temporarily coexist, it is necessary to split the PSSAR Form into two different formats – one is for requesting access to JPAS, the other is updated for DISS. Respondents only fill out the applicable version and will never fill out both versions, to avoid any duplication or double-counting during the transition from JPAS to DISS. For further information, please see the attached supplemental background document.

3. Use of Information Technology

100% of respondents may complete and submit the PSSAR Forms electronically.

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

This information collection is conducted as required to access the personnel systems which the Facility Security Officers use to maintain records. If collection were stopped, ability to make suitability determinations for employment and access to classified information would be infeasible for active duty military, civilian employees and contractors.

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 (FRN) for the collection published on Thursday, March 22, 2018. The 60-Day FRN citation is 83 FRN 12569.

No comments were received during the 60-Day Comment Period.

A 30-Day Federal Register Notice for the collection published on Thursday, September 20, 2018. The 30-Day FRN citation is 83 FRN 47610.

#### Part B: CONSULTATION

No additional consultation apart from soliciting public comments through the Federal Register 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

A Privacy Act Statement is provided for respondents at the top of the PSSAR Forms.

The SORNs which cover the PSSAR Forms may be found at the following links:

Joint Personnel Adjudication System (JPAS):

<https://dpcl.d.defense.gov/Privacy/SORNsIndex/DOD-wide-SORN-Article-View/Article/570567/dmdc-12-dod/>

Defense Information System for Security (DISS):

<https://dpcl.d.defense.gov/Privacy/SORNsIndex/DOD-wide-SORN-Article-View/Article/799795/dmdc-24-dod/>

Secured Web Fingerprint Transmission (SWFT):

<https://dpcl.d.defense.gov/Privacy/SORNsIndex/DOD-wide-SORN-Article-View/Article/588980/dmdc-19-dod/>

Defense Central Index of Investigations (DCII):

<https://dpcl.d.defense.gov/Privacy/SORNsIndex/DOD-wide-SORN-Article-View/Article/570716/dmdc-13-dod/>

The Privacy Impact Assessments for DISS, JPAS, SWFT, and DCII cover the PSSAR Forms and are published online at <https://www.dmdc.osd.mil/appj/dwp/documents.jsp>.

#### 11. Sensitive Questions

A Social Security Number Justification Memo has been attached as part of this collection package.

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

Part A: ESTIMATION OF RESPONDENT BURDEN

- 1) Collection Instrument(s)  
[PSSAR Forms]
  - a) Number of Respondents: **22,225**
  - b) Number of Responses Per Respondent: **1**
  - c) Number of Total Annual Responses: **22,225**
  - d) Response Time: **10 minutes**
  - e) Respondent Burden Hours: **3,704 hours**
  
- 2) Total Submission Burden (Summation or average based on collection)
  - a) Total Number of Respondents: **22,225**
  - b) Total Number of Annual Responses: **22,225**
  - c) Total Respondent Burden Hours: **3,704 hours**

Part B: LABOR COST OF RESPONDENT BURDEN

- 1) Collection Instrument(s)  
[PSSAR Forms]
  - a) Number of Total Annual Responses: **22,225**
  - b) Response Time: **10 minutes**
  - c) Respondent Hourly Wage: **\$32.50**
  - d) Labor Burden per Response: **\$5.42**
  - e) Total Labor Burden: **\$120,385**
  
- 2) Overall Labor Burden
  - a) Total Number of Annual Responses: **22,225**
  - b) Total Labor Burden: **\$120,385**

The Respondent hourly wage was determined by using information gathered from [https://www.payscale.com/research/US/Job=Facility\\_Security\\_Officer\\_\(FSO\)/Salary](https://www.payscale.com/research/US/Job=Facility_Security_Officer_(FSO)/Salary) or <https://www.bls.gov/oes/current/oes131041.htm>, assuming an average salary of \$65,000.

13. Respondent Costs Other Than Burden Hour Costs

There are no capital and start-up costs associated with the PSSAR Form.

14. Cost to the Federal Government

Part A: LABOR COST TO THE FEDERAL GOVERNMENT

- 1) Collection Instrument(s)  
[PSSAR Forms]
  - a) Number of Total Annual Responses: **22,225** as established in section 12a
  - b) Processing Time per Response: **10 minutes**

Processing time includes validating form for completeness, accuracy, validity and setting up system account as necessary.

c) Hourly Wage of Worker(s) Processing Responses : **\$21.01**

Hourly rate estimate is taken from the GS09 (step 1) salary per the adjusted 2018 OPM rates Reference: [https://www.opm.gov/policy-data-oversight/pay-leave/salaries-wages/salary-tables/pdf/2018/GS\\_h.pdf](https://www.opm.gov/policy-data-oversight/pay-leave/salaries-wages/salary-tables/pdf/2018/GS_h.pdf)

d) Cost to Process Each Response: **\$3.50**

e) Total Cost to Process Responses: **\$77,825**

2) Overall Labor Burden to the Federal Government

a) Total Number of Annual Responses: **22,225**

b) Total Labor Burden: **\$77,825**

#### Part B: OPERATIONAL AND MAINTENANCE COSTS

1) Cost Categories

a) Equipment: **\$0**

b) Printing: **\$0**

c) Postage: **\$0**

d) Software Purchases: **\$0**

e) Licensing Costs: **\$0**

f) Other: **\$0**

2) Total Operational and Maintenance Cost: **\$0**

This form and subsequent process is electronic and not requiring special equipment, licenses, software, postage or printing.

#### Part C: TOTAL COST TO THE FEDERAL GOVERNMENT

1) Total Labor Cost to the Federal Government: **\$77,825**

2) Total Operational and Maintenance Costs: **\$0**

3) Total Cost to the Federal Government: **\$77,825**

#### 15. Reasons for Change in Burden

This is a renewal of an existing collection with a change.

### **Respondent Annual Hours Burden**

The new total number of hours requested is: **3,704 hours**

The current burden estimate is: **7,333 hours**

The change of burden hours is decreased of **3,629 hours**

The **decrease of 3,629 is annual hours** is the result of **Program Adjustment** to more accurately reflect the number of public respondents. The number of respondents is **reduced from 44,000 to 22,225**. The frequency and estimated time to respond have **remained the same at 1 and 10 minutes respectively**.

### **Respondent Labor Cost Burden**

The new labor cost burden is: **\$120,385**

The current labor cost burden is: **\$117,300**

The change in labor cost burden is an increase of **\$3,085**

The **increase of \$3,085** is the result of **Program Adjustment** to an updated respondent hourly wage and number of respondents. Respondent change is outlined above. The previously used wage of \$16 is now \$32.50 according to recent sources.

### **Labor Cost to the Federal Government**

The new annual cost burden is: **\$77,825**

The current annual cost burden is: **\$4,400,000**

The change of annualized cost burden is a decrease of **\$4,322,175**

The **decrease of \$4,322,175 in annualized cost** burden is the result of **Program Adjustment**, as the capital and startup costs previously captured here have been accounted for under the Personnel Security Systems' OMB Numbers. The capital and startup costs previously set at \$100 are now \$0 due to the PIV credentials that made up this cost not being needed to complete the PSSAR Form. The current annual cost burden solely reflects the federal government labor required for validation, accuracy, and completeness of the form as well as creating the account.

#### 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.