

**SUPPORTING STATEMENT FOR PAPERWORK REDUCTION ACT  
SUBMISSION:  
Risk Analysis Information  
OMB No. 1405-0204  
DS-4184**

**A. JUSTIFICATION**

1. *Why is this collection necessary and what are the legal statutes that allow this?*

The Risk Analysis Information form (DS-4184) is a supplementary form for security screening that is completed by organizations, entities or individuals applying for Department of State contracts, grants or other funding at the request of the Department. Organizations, entities or individuals applying or competing State Department funding are made aware of the security screening requirement prior to application. Information collected includes the name, date and place of birth, gender, citizenship(s), U.S. passport or Social Security number if US citizen or Legal Permanent Resident, address, telephone and fax numbers, e-mail address, and current employer and job title of each of the “key personnel” of the organization. “Key Personnel” may include, but is not limited to the prime organization or company’s President, Vice President, Executive Director, Deputy Executive Director, Chief Executive Officer, Chief Operating Officer, Treasurer, Secretary, and the Board of Directors. It may also include Program or Project Managers. This security screening requirement is also applicable to subcontractors, sub-grantees and beneficiaries. The information is entered into public and government and databases for screening to ensure that any funds awarded will not be used to provide support to entities or individuals deemed to be a risk to national security. The statutes and regulations authorizing the collection of information are: 18 U.S.C. 2339A, 2339B, 2339C; 22 U.S.C. 2151 et seq.; Executive Orders 13224, 13099 and 12947; Homeland Security Presidential Directive 6; and section 7034(e) Department of State, Foreign Operations, and Related Programs Appropriations Act, 2018 (Div. K, P.L. 115-141) and similar provisions in prior year acts.

2. *What business purpose is the information gathered going to be used for?*

Risk Analysis and Management (RAM) analysts use the information collected from commercial, public, and U.S. government databases to determine the risk that the applying organization, entity or individual might divert Department funds to entities or individuals deemed to be a risk to national security.

3. *Is this collection able to be completed electronically (e.g. through a website or application)?*

When requested, the Department of State Risk Analysis Information form is completed by the organization, entity or individual and sent to RAM electronically via the secure portal, e-mail, and fax or by paper via mail. It is estimated going forward, 100% will be submitted electronically via the Portal and 0% will be submitted via other means. The Department is aware of the concerns of members of the public that this data collection may be duplicative of data

collected by other US government agencies. While it understands those concerns and the burden, under many circumstances some duplication is unavoidable due to the fact that access to data collected by other government agencies about their contractors and grantees is not available to the Department.

4. *Does this collection duplicate any other collection of information?*

No other program currently exists to analyze the risk that Department of State funds awarded in contracts, grants, or other funding mechanisms will be diverted to entities or individuals deemed to be a risk to national security. The information provided by the respondent on the Risk Assessment Information form is not collected elsewhere in the Department. The Department may designate additional countries for vetting after determining that funding is at risk of being diverted to entities or individuals deemed to be a risk to national security.

5. *Describe any impacts on small business.*

The collection of information does not impact small businesses or other small entities.

6. *What are consequences if this collection is not done?*

There currently is no other program in place to help mitigate the risk that Department funds could be awarded to entities or individuals that are deemed to be a risk to national security. The information collected is used to identify those who are a risk, and to mitigate the risk of diversion of Department funds to entities or individuals deemed to be a risk to national security.

7. *Are there any special collection circumstances?*

No special circumstances exist.

8. *Document publication (or intent to publish) a request for public comments in the Federal Register*

The Department of State published a 60-day notice on November 1, 2018 in accordance with 5 CFR 1320.8(d) to solicit public comments for the collection in the *Federal Register*. 83 FR 54974. One comment was received but was not relevant to the collection.

9. *Are payments or gifts given to the respondents?*

No payments or gifts are given to respondents.

10. *Describe assurances of privacy/confidentiality*

No assurances of confidentiality have been made to the respondent.

11. *Are any questions of a sensitive nature asked?*

The form asks questions of a sensitive nature.

12. *Describe the hour time burden and the hour cost burden on the respondent needed to complete this collection*

For the ongoing program, we estimate 500 DS-4184 information forms will be completed annually. We also estimate that the average form will include information on five key personnel. The overall estimated time required to gather the necessary information, complete each form, and submit it, is 90 minutes. The estimated annual hour burden to the public is 750 hours (500 responses X 90 minutes to complete each response, divided by 60 minutes). Estimates on the time associated with the Risk Assessment Information form (DS-4184) were acquired by asking a group of persons not involved in creating the form to complete it using fictitious information. Extra time was added for research that may have been required to collect the information.

The hour burden for the individual providing information via the DS-4184 is estimated at 90 minutes. Based on wage rates calculated by the US Department of Labor, Bureau of Labor Statistics for an Executive Assistant/Executive Secretary (\$41.00 an hour plus fringe benefits and overhead calculated at 33%) to enter the data, the estimated cost to the respondent an hour for 90 minutes, is \$82.00 per submission.<sup>1</sup>

13. *Describe the monetary burden to respondents (out of pocket costs) needed to complete this collection.*

There is no cost burden for the public associated with this form.

14. *Describe the cost incurred by the Federal Government to complete this collection.*

Cost of the form to Federal government:

Based on experience, the assumption is that 500 DS-4184 forms will be submitted annually, and we estimate that none of the information forms will be submitted outside the RAM Portal. Current submission estimates are based on data gathered during previous years of the pilot. Based on current fiscal data including data entry, acceptance, review and evaluation of data, program office review and evaluation, the total projected operating budget including labor, supplies, equipment, printing, materials, overhead, support staff, professional program staff, hardware, software, etc. is \$2,700,000.

15. *Explain any changes/adjustments to this collection since the previous submission*

The numbers cited in this Supporting Statement have been revised to more accurately reflect the number of responses and burden hours in the initial stages of the pilot program and the expansion of the system to use a secure web based portal for electronic submissions. The decrease in responses from 800 to 500 and the decrease in the hours from 1200 to 750 reflect actual submissions and 100% usage of the electronic portal. As to changes made to the form, Part 5: Submission Details (Government Use Only) and the section titled "Work Performed for AMOS" have been deleted. Under "Key Individual Information" to the section titled "Place of Birth" the

clarification (City, State, Province, Country) has been added. In the box titled “Skype Address” “WHATSAPP” has been added to the information collected. In the section titled “Privacy Act Statement” additional language has been inserted to the section “Routine Uses” and now reads: “The information is used to make determinations on applications for contracts, grants or other funding and may be disclosed and the sentence now reads United States Agency for International Development (USAID) and other U.S. Government agencies for collaborative and vetting programs.”

16. *Specify if the data gathered by this collection will be published.*

Results of this collection will not be published.

17. *If applicable, explain the reason(s) for seeking approval to not display the OMB expiration date.*

The expiration date for OMB approval of the information collection will be displayed on the form.

18. *Explain any exceptions to the OMB certification statement below.*

The Department is not requesting any exceptions to the certification statement.

## **B. COLLECTION OF INFORMATION EMPLOYING STATISTICAL METHODS**

This collection does not employ statistical methods.

<sup>1</sup> Based on wage rates calculated by the US Department of Labor, Bureau of Labor Statistics.