

SUPPORTING STATEMENT - PART A

Army and Air Exchange Service Personal Identity Verification of Contractor/Vendor Personnel (0702-0135)

1. Need for the Information Collection

The Secretary of Defense has vested in the Secretary of the Army and the Secretary of the Air Force all functions, powers, and duties relating to Army and Air Force Exchange Service (AAFES) activities within their respective military departments. This authority is held jointly and equally. Army Regulation 215-8/Air Force Instruction 34-211(I), *Army and Air Force Exchange Service Operations*, in accordance with Title 10, U.S.C. §7013, *Secretary of the Army* and §9013, *Secretary of the Air Force*, charges the AAFES with the dual and enduring mission of providing quality merchandise and services to its customers at competitively low prices and of generating earnings which provide a dividend to support family, morale, welfare, and recreation (FMWR) programs.

The prescribing directive, which governs the security investigations and clearances of assigned AAFES contractors and vendors, as well as employees, is DoDI 5200.01, *DoD Information Security Program and Protection of Sensitive Compartmented Information* and DoDI 5200.02, *DoD Personnel Security Program (PSP)*. Additionally, security procedures are in compliance with Executive Order (EO) 13526, *Classified National Security Information*, EO 10450, *Security Requirements for Government Employment*; AR 380-67, *Personnel Security Program*; DoDM 5200.02, *Procedures for the Department of Defense Personnel Security Program*, AF116-1405, *Air Force Personnel Security Program*, AF116-1404, *Information Security Program Management*, and EO 13478, dated November 18, 2008, which amended EO 9397, dated November 22, 1943. The AAFES Director/Chief Executive Officer (CEO) has the authority to identify security clearance jurisdiction over the AAFES Headquarters (HQ) and its subordinate activities.

The AAFES retail mission requires timely delivery of products and services to military service members with the assistance of vendors and contractors. Information collected to facilitate the initiation, investigation, and adjudication of information relative to DoD security clearance for these contractors and vendors.

After an AAFES contract has been awarded, prior to performing or conducting any approved contractual work on any federal installation, the contractor/vendor shall comply with the local installation's personal identity verification procedures, mandated by Homeland Security Presidential Directive (HSPD)-12; <http://www.dhs.gov/homeland-security-presidential-directive-12>.

2. Use of the Information

After AAFES awards a contract, the awarded contractors/vendors must complete and submit a security pre-screening packet via the AAFES Resource Onboarding Application (ROBA), which prepopulates the requested AAFES security forms significantly decreasing the respondent's burden. Pre-screening is conducted to ensure that potential AAFES contractors are able to pass a preliminary background check. This reduces the overall cost burden for AAFES, eliminating a large subset of contractors who most likely will not pass a normal background investigation. The inception and utilization of ROBA allows contractors/vendors a single electronic input of his/her data resulting in a rapid population of the manual forms. ROBA reduces redundancy of information, minimizes errors, and decreases the respondent's processing time. When the collection of information is completed through ROBA, the Resource Administrator (RA) creates a ROBA account and emails the contractor/vendor a temporary ID and password.

Currently, not all contractors/vendors use ROBA. AAFES still receives a small number of paper forms such as expedited requests that are approved by AAFES High-level/senior management. In an effort to obtain 100% electronic input, ROBA is being enhanced to accommodate such unique business needs.

Contractors/vendors have the ability to schedule an appointment on-line through ROBA. If the contractor/vendor is unable to appear in person, the security package must contain a completed fingerprint card certified and presented on either the United States, Department of Justice, Federal Bureau of Investigation Form FD-258, *Applicant Fingerprint Card* or the U.S. Office of Personnel Management (OPM) Standard Form (SF) 87, *Fingerprint Card*.

Alternatively, the awarded contractor/vendor can manually complete the required forms. Manual forms are provided when the contractor/vendor cannot access ROBA, such as when they will be working in overseas locations or due to technical limitations. When the information is completed manually, the RA provides the contractor/vendor directions on what must be included within his/her security package including which forms are required, how to complete the forms, and what other documents must be presented as supplemental material. Once completed, the contractor/vendor must either hand deliver or mail (with tracking number) the packet back to the RA. (Note: the following forms will not be required if the contractor/vendor has access to ROBA.) The manual exchange forms are:

1. Exchange Form 3900-002 (Trusted Associate Sponsorship System).

AAFES contractors/vendors obtain a Common Access Card (CAC) in order to gain access to AAFES facilities, which are located on military installations. An AAFES Trusted Agent for the Trusted Associate Sponsorship System (TASS), a system owned and controlled by the Defense Manpower Data Center, utilizes the information collected on the Exchange Form 3900-002 to input into TASS. Input into this system allows the contractor/vendor to be sponsored in the Defense Enrollment and Eligibility Reporting

Systems (DEERS), which is required for CAC authorization. Form 3900-002 collects the contractor's/vendor's name, phone number, date of birth, Social Security Number (SSN), e-mail address, contract number and contract ending date, and the Exchange Point of Contact. In addition, this form is also used by the Exchange Headquarters, Director of Staff-Force Protections as a check list for verification in the Joint Personnel Adjudication System (JPAS), TASS, background, and e-QIP.

2. Exchange Form 3900-006 (Background Check for Facility Access). This form is required when a contractor/vendor requires AAFES facility access. Form 3900-006 must be completed prior to meeting with Force Protection or must be included within the contractor/vendor submission of the security package.

3. Exchange Form 3900-013 (Request for e-QIP Access). Information collected on Exchange Form 3900-013 is used by AAFES Force Protection to facilitate the pre-screening selection process and contractor/vendor access into e-QIP. This form collects the contractor's/vendor's name, gender, date of birth, SSN, place of birth, work location, region, position title, phone number, e-mail address, past military or AAFES location, and supervisor's names along with their phone number and e-mail address.

The initiation of federal investigations for contractors/vendors and AAFES associates require extra efforts to support their work responsibilities. The option of childcare checks, deployment, firearms and other situations are shown on Exchange Form 3900-013. Contractors/vendors or AAFES associates that will be working with or around children under the age of 18 are required to have childcare background clearance/checks included within their investigations in accordance with the Crime Control Act of 1990 (Public Law 101-647). The extra coverage for childcare is required to be coded in the OPM e-QIP system to ensure that the National Background Investigation Bureau conducts the appropriate investigation.

AAFES upholds Alcohol Tobacco and Firearms, corporate and installation regulatory compliance of inherently dangerous inventory while safeguarding the community. The AAFES's Firearms Sales Program emphasizes compliance perfection to prevent federal, state and installation incidents and investigations. Support and participation by management and associates at all levels are required to make this program successful.

For the manual process, the RA will then make an appointment with the AAFES HQ Force Protection to complete fingerprinting requirements. If the contractor/vendor is unable to appear in person, the security packet must contain a completed fingerprint card certified by a reliable source such as a local police station or base force protection. The acceptable fingerprint card presented must be on either the United States, Department of Justice, Federal Bureau of Investigation Form FD-258, *Applicant Fingerprint Card* or the U.S. Office of Personnel Management (OPM) Standard Form (SF) 87, *Fingerprint Card*.

Once all collected information is obtained, analyzed, and approved, AAFES Force Protection inputs the necessary data into *Electronic Questionnaires for Investigative*

Processing (e-QIP) system to process the Standard Form (SF) 85, *Questionnaire for Non-Sensitive Positions* and/or the SF 86, *Questionnaire for National Security Positions* which begins the investigative process. Once the RA reviews the e-QIP for completeness and errors, the contractor/vendor will then log into the form to affirm all their answers and responses.

3. Use of Information Technology

The Exchange encourages respondents to utilize technology to the fullest extent possible in order to reduce burden on the public. 98% of the information is now collected electronically. Utilization of the web-based ROBA significantly eliminates redundancies and decreases burden.

Our goal is to move towards a 100% electronic collection through ROBA. Due to on-going business needs/systems upgrades and transitions at this time, AAFES Force Protection receives a small number of paper forms. These applications are expedited and vetted manually as ROBA is still being enhanced to accommodate unique business needs.

4. Non-Duplication

Non-Appropriated Fund Instrumentalities' require usage of different forms that have slight variations from DoD forms in collecting information from its contractors, associates, and vendors for procurement and jurisdiction. Information collected in this system may vary slightly and contain less or more data inquiries than that from other approved collection instruments such as the *Joint Personnel Adjudication System* (JPAS) or the Office of Personnel Management (OPM) e-QIP, *Electronic Questionnaire for Investigative Processing*. AAFES collects information from contractors/vendors on the listed collection instruments identified in Section 2 of this statement in order to aid in the pre-screening of contractors/vendors for credentialing through official Federal investigations.

5. Burden on Small Business

The information collected is the minimum necessary for the AAFES to conduct personal identification verification and background checks to ensure the security of buildings and resources. All efforts have been taken to decrease the burden through electronic submission. Burden on small businesses cannot be further reduced without endangering the United States common defense and national security. AAFES staff estimates that 100% of the responses come from small businesses.

6. Less Frequent Collection

Information is voluntarily provided for security/background checks for the purposes addressed in this statement. Collection is completed on occasion at the time when a

contractor/vendor desires to obtain a business relationship with the AAFES and/or is chosen as the winner of a contract. Less frequent collection is not possible.

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 Title 5 CFR 1320.5(d) (2).

8. Consultation and Public Comments

Part A. PUBLIC NOTICE

A 60-Day Federal Register Notice of the collection published on Thursday, March 21, 2019. The 60-Day FRN citation is 84 FRN 10480.

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

Part B: CONSULTATION

AAFES Force Protection and Information Technology Development provided significant input and information in relation to the continued use and burden relative to this collection of information. It was determined that information is only maintained in one database and used accordingly as outlined in section 2 of this statement.

9. Gifts or Payment

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

10. Confidentiality

The information collected and maintained in this system is protected under the Privacy Act of 1974, as amended. Respondents are assured confidentiality through the Privacy Act Statement(s) available for reading on the applicable collection documents. The Privacy Act Statements have been updated and submitted for OMB's review.

A draft copy of the modified SORN 1703.03, "Personnel Security Clearance Case Files" has been provided with this package for OMB's review.

Enclosed is a copy of the AAFES Privacy Impact Assessment (PIA) for the electronic collection and maintenance of information. The PIA may be viewed at <https://www.aafes.com/about-exchange/public-affairs/FOIA/assessments.htm>

Consistent with the General Records Schedule 5.6, "Security Records" (DAA-GRS-2017-0006-0024), security files for contractors and vendors not issued clearances are destroyed by shredding or erased from the server one year after consideration and, for

those issued clearances, five years after their contract relationship with the AAFES expires. Longer retention is authorized if required for business use.

11. Sensitive Questions

AAFES is required by United States Presidential Executive Orders and federal law to protect federal government assets including citizens, federal property, and Automated Information Systems (AIS) as well as placing individuals in a position of trust for handling of classified information and prevention of terroristic activities. In accordance with the above listed authorities, respondents may be asked to provide Social Security Number (SSN), date of birth, gender, nationality, color or hair and eyes, and weight. Collection of social security number is authorized under DoDI 1000.30 *Reduction of Social Security Number (SSN) Instruction Use Within the DoD*, Enclosure 2, sections 2.c.(2), (3), (4), (5), (8) and (9) as represented on the SSN Memorandum.

12. Respondent Burden, and its Labor Costs

Part A: ESTIMATION OF RESPONDENT BURDEN

1) Collection Instruments

Exchange Form 3900-002. *Trusted Associate Sponsorship Systems (TASS)*

- a) Number of Respondents: 22
- b) Number of Respondents Per Respondent: 1
- c) Number of Total Annual Responses: 22
- d) Response Time: 30 Minutes (.5 Hour)
- e) Respondent Burden Hours: 11 Hours

Exchange Form 3900-006. *Background Check for Facility Access*

- a) Number of Respondents: 22
- b) Number of Respondents Per Respondent: 1
- c) Number of Total Annual Responses: 22
- d) Response Time: 30 Minutes (.5 Hour)
- e) Respondent Burden Hours: 11 Hours

Exchange Form 3900-013. *e-QIP Request Form*

- a) Number of Respondents: 22
- b) Number of Respondents Per Respondent: 1
- c) Number of Total Annual Responses: 22
- d) Response Time: 30 Minutes (.5 Hour)
- e) Respondent Burden Hours: 11 Hours

Resource Onboarding Application System (ROBA)

- a) Number of Respondents: 2834
- b) Number of Respondents Per Respondent: 1
- c) Number of Total Annual Responses: 2834

- d) Response Time: 30 Minutes (.5 Hour)
- e) Respondent Burden Hours: 1417 Hours

2) Total Submission Burden

- a) Total Number of Respondents: 2900
- b) Total Number of Annual Responses: 2900
- c) Total Respondent Burden Hours: 1450 Hours

Part B: LABOR COST OF RESPONDENT BURDEN

Total labor burden has significantly decreased by \$22,836 since the previous approval due to the implementation of ROBA. We based our hourly burden on the current Federal Minimum Wage (2009) posted at the Department of Labor Wage Website. (<https://www.dol.gov/general/topic/wages/minimumwage>).

1) Collection Instruments

Exchange Form 3900-002. *Trusted Associate Sponsorship Systems (TASS)*

- a) Number of Total Annual Responses: 22
- b) Response Time: 30 Minutes (.5 Hour)
- c) Respondent Hourly Wage: \$7.25
- d) Labor Burden Per Response: \$3.63
- e) Total Labor Burden: \$80

Exchange Form 3900-006. *Background Check for Facility Access*

- a) Number of Total Annual Responses: 22
- b) Response Time: 30 Minutes (.5 Hour)
- c) Respondent Hourly Wage: \$7.25
- d) Labor Burden Per Response: \$3.63
- e) Total Labor Burden: \$80

Exchange Form 3900-013. *e-QIP Request Form*

- a) Number of Total Annual Responses: 22
- b) Response Time: 30 Minutes (.5 Hour)
- c) Respondent Hourly Wage: \$7.25
- d) Labor Burden Per Response: \$3.63
- e) Total Labor Burden: \$80

Resource Onboarding Application System (ROBA)

- a) Number of Total Annual Responses: 2834
- b) Response Time: 30 Minutes (.5 Hour)
- c) Respondent Hourly Wage: \$7.25
- d) Labor Burden Per Response: \$3.63
- e) Total Labor Burden: \$10,273

2) Overall Labor Burden

- a) Total Number of Annual Responses: 2900
- b) Total Labor Burden: \$10,513

13. Respondent Costs Other Than Burden Hour Costs

In accordance with HSPD-12, contractors/vendors who elect to mail their security package to EG-FP would be responsible for paying the applicable postage fees. In most cases, the vendor/contractor will incur the cost of postage for 1st class mail (\$0.55/oz.) or the cost of overnight mail services (\$25.00-\$30.00). AAFES does not track the number or the amount of packages received by mail.

14. Cost to the Federal Government

Part A: LABOR COST TO THE FEDERAL GOVERNMENT

1) Collection Instruments

Exchange Form 3900-002. *Trusted Associate Sponsorship Systems (TASS)*

- a) Number of Total Annual Responses: 22
- b) Processing Time per Response: 10 Minutes (.17 Hour)
- c) Hourly Wage of Worker(s) Processing Responses: \$22.00
- d) Cost to Process Each Response: \$3.74
- e) Total Cost to Process Responses: \$82

Exchange Form 3900-006. *Background Check for Facility Access*

- a) Number of Total Annual Responses: 22
- b) Processing Time per Response: 10 Minutes (.17 Hour)
- c) Hourly Wage of Worker(s) Processing Responses: \$22.00
- d) Cost to Process Each Response: \$3.74
- e) Total Cost to Process Responses: \$82

Exchange Form 3900-013. *e-QIP Request Form*

- a) Number of Total Annual Responses: 22
- b) Processing Time per Response: 10 Minutes (.17 Hour)
- c) Hourly Wage of Worker(s) Processing Responses: \$22.00
- d) Cost to Process Each Response: \$3.74
- e) Total Cost to Process Responses: \$82

Resource Onboarding Application System (ROBA)

- a) Number of Total Annual Responses: 2834
- b) Processing Time per Response: 30 Minutes (.5 Hour)
- c) Hourly Wage of Worker(s) Processing Responses: \$22.00
- d) Cost to Process Each Response: \$11.00
- e) Total Labor Burden: \$31,174

2) Overall Labor Burden to Federal Government

- a) Total Number of Annual Responses: 2900

b) Total Labor Burden: \$31,420

The hourly wage of workers was determined by taking actual average salaries of associates who process the collected information. Processors are paid at the NF Pay Band 3 level shown on the attached April 15, 2019 Defense Civilian Personnel Advisory Service (DCPAS)

(<https://www.dcpas.osd.mil/Content/NAF%20Schedules/survey-sch/152/152-033-50-NF.html>).

Part B: OPERATIONAL AND MAINTENANCE COSTS

1) Cost Categories

- a) Equipment: \$7,431
- b) Printing: \$260
- c) Postage: \$200
- d) Software Purchases: \$32,739 (AAFES built ROBA; depreciation rate of \$6,548/year)
- e) Licensing Costs: None
- f) Other: \$4,370 (fingerprinting yearly cost)
\$174,500 (ROBA IT Support)

2) Total Operational and Maintenance Cost: \$219,500

Part C: TOTAL COST TO THE FEDERAL GOVERNMENT

- 1) Total Labor Cost to the Federal Government: \$31,420
- 2) Total Operational and Maintenance Costs: \$219,500
- 3) Total Cost to the Federal Government: \$250,920 (includes start-up costs for ROBA and annual fingerprint machine; Expenses paid using non-appropriated funds.)

15. Reasons for Change in Burden

The burden has significantly decreased since the previous approval due to the implementation of the web-based ROBA. Even with an increased respondent input of 600 individuals, the total burden hours decreased by 3,150 hours and the cost to the respondents decreased by \$22,836. The advent of technology has made a positive difference on the overall collection of information.

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.