

**SUPPORTING STATEMENT FOR THE
INTERVIEW SURVEY FORM, INV 10
OMB #3206-0106**

Justification:

- 1. Explain the circumstances that make the collection of information necessary. Identify any legal or administrative requirements that necessitate the collection.**

The information collected on the Interview Survey Form (INV 10) is used as a quality control instrument designed to ensure the accuracy and integrity of the investigative product. The form queries the recipient about the investigative procedure exhibited by the investigator, the investigator's professionalism, and the information discussed and reported. In addition to the preformatted response options, OPM invites the recipients to respond with any other relevant comments or suggestions. The U.S. Office of Personnel Management (OPM) is authorized to request this information principally under 5 U.S.C. 301 and the Federal Records Act, 44 U.S.C. 3101, which authorizes OPM to undertake actions to secure accuracy and uniformity in the functions of the Office.

- 2. Indicate how, by whom, and for what purpose the information is to be used. Except for a new collection, indicate the actual use the agency has made of the information received from the current collection.**

The Interview Survey Form, INV 10 is mailed by OPM, to a random sampling of record and personal sources contacted during background investigations when investigators have performed fieldwork. The information collected on the INV 10 is utilized by the National Background Investigation Bureau (NBIB) Integrity Assurance and other management entities to evaluate the performance and conduct of the investigators conducting the investigations. The INV 10 is used as a quality control instrument designed to ensure the accuracy and integrity of the investigative product. The form queries the recipient about the investigative procedure exhibited by the investigator, the investigator's professionalism, and the information discussed and reported. In addition to the preformatted response options, OPM invites the recipients to respond with any other relevant comments or suggestions.

- 3. Describe whether, and to what extent, the collection of information involves the use of automated, electronic, mechanical, or other technological collection techniques or other forms of information technology, e.g., permitting electronic submission of responses, and the basis for the decision for adopting this means of collection. Also describe any consideration of using information technology to reduce burden.**

The collection of information does not involve automated, electronic, mechanical or other technical collection techniques. The INV 10 must be signed by the applicant,

to certify that all information provided is true, correct, complete and made in good faith. Because OPM must reach out to the investigative sources through their home or business addresses to solicit this information, we believe a paper mail-in form is more practical than an automated form, to ensure responses. Further, referring sources to an automated form and then requiring electronic signature and authentication would impose additional burdens on the respondents, as well as potentially reducing the response rate.

4. Describe efforts to identify duplication.

Not Applicable. The information collection does not duplicate any other OPM collections.

5. If the collection of information impacts small businesses or other small entities (Item 5 of OMB Form 83-I), describe any methods used to minimize burden.

There will be no significant economic impact on a substantial number of small entities. Some respondents will be small entities that provided personal testimony or records in the OPM investigations for which we seek follow-up information. OPM has minimized the paperwork burden of this collection (1) by submitting it only to those entities that already voluntarily provided source information in the OPM investigations at issue and (2) by ensuring that the form imposes minimal paperwork burden through limited follow-up questioning (see section 12).

6. Describe the consequence to Federal program or policy activities if the collection is not conducted or is conducted less frequently, as well as any technical or legal obstacles to reducing burden.

The National Background Investigation Bureau (NBIB) emphasizes that investigations be conducted with the highest professional integrity. To maintain the high standards, NBIB requests feedback from individuals being interviewed by field investigators to ensure that the investigators are performing their duties with the utmost professionalism and in compliance with Federal and contract requirements. Any compromise of the quality and/or integrity of NBIB Investigations may result in negative impacts on NBIB operations, operations of other federal agencies, and potentially, National Security. NBIB utilizes a variety of methods to ensure the accuracy of the investigative products. The INV 10 is a crucial component of this effort.

7. Explain any special circumstances that would cause an information collection to be conducted in a manner inconsistent with the guidelines in 5 CFR 1320.6.

Not applicable. This information collection is in compliance with 5 CFR 1320.6.

8. If applicable, provide a copy and identify the date and page number of publication in the Federal Register of the agency's notice, required by 5 CFR

1320.8(d), soliciting comments on the information collection prior to submission to OMB. Summarize public comments received in response to that notice and describe actions taken by the agency in response to these comments. Specifically address comments received on cost and hour burden. Describe efforts to consult with persons outside the agency to obtain their views on the availability of data, frequency of collection, the clarity of instructions and recordkeeping, disclosure, or reporting format (if any), and on the data elements to be recorded, disclosed, or reported. Consultation with representatives of those from whom information is to be obtained or those who must compile records should occur at least once every 3 years - even if the collection of information activity is the same as in prior periods. There may be circumstances that may preclude consultation in a specific situation. These circumstances should be explained.

The 60-day Federal Register Notice was published on February 1, 2019 (84 FR 1250). No comments were received. As part of the 30 day Federal Register notice, OPM proposes the following revisions to the Privacy Act Statement: **Privacy Act Statement** Pursuant to 5 U.S.C. § 552a (e)(3), this Privacy Act Statement explains why OPM is requesting the information on this form. **Authority:** 5 U.S.C. 301; the Federal Records Act, 44 U.S.C. 3101. **Purpose:** The primary purpose of the information you furnish will be to assess the quality, conduct, and professionalism of the investigator listed above during the course of the investigation. The agency uses this information to appraise, instruct, and improve the performance of Federal staff and contractors to assist in its personnel management evaluation and to determine if additional training or other action is necessary. **Routine Uses:** Information from this form may be disclosed to the investigator listed on the form, if requested and required under the provisions of the Freedom of Information Act and/or the Privacy Act. It also may be disclosed externally as a “routine use” to other entities as described in the OPM Internal-20 Integrity Assurance Officer Control Files system of records notice, available at www.opm.gov/privacy. **Consequences of Failure to Provide Information:** Completing this form is voluntary. There are no adverse effects if you do not complete this form.

9. **Explain any decision to provide any payment or gift to respondents, other than remuneration of contractors or grantees.**

Not applicable. Individuals voluntarily complete this form.

10. **Describe any assurance of confidentiality provided to respondents and the basis for the assurance in statute, regulation, or agency policy.**

The INV 10 contains a Privacy Act Statement, as required by 5 U.S.C 552a

11. **Provide additional justification for any questions of a sensitive nature, such as sexual behavior and attitudes, religious beliefs, and other matters that are commonly considered private. This justification should include the reasons why the agency considers the questions necessary, the specific uses to be made of the**

information, the explanation to be given to persons from whom the information is requested, and any steps to be taken to obtain their consent.

Question 6 of the collection asks the source to describe concerns that he or she reported to the investigator about the subject of the investigation, including, e.g., criminal conduct, illegal drug use, or violent behavior. This question is necessary as part of OPM's integrity assurance and quality control effort to ensure that its investigators collected information they were required to collect under national security and suitability guidelines.

12. Provide estimates of the hour burden of the collection of information.

It is estimated that 179,637 INV 10 forms are mailed to individuals annually. It is estimated that 67,391 individuals respond. Each INV 10 form takes an estimated 6 minutes to complete. The number of forms completed varies depending on the number of individuals voluntarily completing and returning the form. Estimates are provided below:

	<u>Number of Respondents</u>	<u>Burden Hours</u>
INV 10	67,391	6,739

The overall annual public burden hours for the INV 10 are 6,739 hours. This figure has been calculated utilizing the subsequent parameters: 67,391 (number of respondents) x 6 minutes (approximate time to complete the form) = 404,346 minutes / 60 minutes = 6,739 hours (annual public burden hours).

13. Provide an estimate for the total annual cost burden to respondents or record keepers resulting from the collection of information.

Not applicable. There is no cost to individual respondents.

14. Provide estimates of annualized cost to the Federal Government. Also provide a description of the method used to estimate cost which should include quantification of hours, operational expenses (such as equipment, overhead, printing, and support staff) and any other expenses that would not have been incurred without the paperwork burden.

It is estimated that the cost to print, mail, and maintain the INV 10 form is \$116,422. This figure is based on the annual total INV 10s mailed (179,637), supplies and postage \$73,292 + total INV 10s responses received (67,391), postage \$43,130 = \$116,422.

15. Explain the reasons for any program changes or adjustments reported in Items 13 or 14 of the OMB Form 83-I.

The overall annual public burden hours for the INV 10 have increased from 6,197 to 6,739 hours to reflect an adjustment of the annual burden hours from previous hours cited. The increase reflects the number of individuals voluntarily completing and returning the form.

- 16. For collections of information whose results will be published, outline plans for tabulation and publication. Address any complex analytical techniques that will be used. Provide the time schedule for the entire project, including beginning and ending dates of the collection of information, completion of report, publication dates, and other actions.**

Not applicable. Information collected on the forms will not be published.

- 17. If seeking approval to not display the expiration date for OMB approval of the information collection, explain the reasons that display would be inappropriate.**

Not applicable.

- 18. Explain each exception to the certification statement identified in Item 19, "Certification for Paperwork Reduction Act Submissions," of OMB Form 83-I.**

Not applicable.