

Supporting Statement for Paperwork Reduction Act Submissions  
New request  
FACE External Repository Survey  
**OMB Control #**

Part A. Justification

1. Necessity of Information:

The "External Repository Survey" is essential to the mission of the FBI CJIS Division, Biometric Services Section (BSS) because the collection of data from the "External Repository Survey" will assist the FBI in determining whether external partner systems are sufficiently accurate for the FBI CJIS Division, BSS's use in support of active FBI investigations. On June 4, 2019, the Deputy Assistant Director of the FBI CJIS Division testified on before the United States House of Representatives Committee on Oversight and Government Reform regarding the FBI's use of face recognition technology. The Committee members expressed concern that the FBI CJIS Division had not taken sufficient action to address a Government Accountability Office recommendation that the FBI assess the accuracy of face recognition systems operated by external partners. While the FBI does not have authority to conduct accuracy tests on external systems, the FBI CJIS Division can collect information from external partners to ensure that these external systems are sufficiently accurate for the FBI CJIS Division, BSS use in support of FBI investigations.

2. Needs and Uses:

This form is intended to collect information to aid in ensuring that the external systems are sufficiently accurate for the FBI CJIS Division, BSS use in support of FBI investigations.

3. Use of Technology:

This form is being made electronically available to the submitter for their convenience.

4. Efforts to Identify Duplication:

The FBI is the only federal agency tasked with ensuring external system accuracy based on the data from this collection.

5. Methods to Minimize Burden on Small Businesses:

This information will have no significant impact on small entities. Small businesses will not be affected by this collection.

6. Consequences of Less Frequent Collection:

This is a one-time collection of information to aid in ensuring that the external systems are

sufficiently accurate for the FBI CJIS Division, BSS use in support of FBI investigations.

#### 7. Special Circumstances Influencing Collection:

The "External Repository Survey" is necessary, because it is the only way to achieve compliance with the request for information from the United States House of Representatives Committee on Oversight and Government Reform and the Government Accountability Office. This request for information was not previously assigned/delegated to the FBI CJIS Division. The CJIS Division must begin gathering the necessary information to collect information from external partner agencies operating face recognition databases performing searches on behalf of the FBI CJIS Division BSS in support of FBI investigations. By collecting this information, the FBI CJIS Division BSS will be able to determine whether the external systems are sufficiently accurate for the FBI's use. This canvas for responsive information will also allow the FBI to provide complete and accurate information to members of Congress, the Government Accountability Office, and the American public. This collection must take place at the earliest opportunity to meet the July 2019 deadline. Collecting this information is merely the first step in the FBI's evaluating whether the face recognition systems operated by partner agencies are sufficiently accurate to meet the FBI's investigative needs. Once information is received, it will require additional man hours to review each agency response and then generate responses to Congress and the Government Accountability Office.. Approval of the template is necessary before the expiration of the 60-day and 30-day notice periods, because it is the only way to achieve compliance with the request for additional information from United States House of Representatives Committee on Oversight and Government Reform members. Otherwise, the FBI CJIS Division Deputy Assistant Director will be unable to provide complete, accurate information in response to Congressional inquiries. If the normal process for obtaining an Office of Management and Budget (OMB) number is required, adding a 90-day or even a 60-day OMB clearance process, would prevent the CJIS Division, BSS from being able to solicit the information needed to comply with requests for information from Congress regarding the FBI CJIS Division, BSS's use of face recognition technology The questionnaire needs to be disseminated to agencies beginning June 24, 2019, in order to allow the agencies adequate time to determine an accurate response, as well, as time to then develop, draft and coordinate a response to members of the United States House of Representatives Committee on Oversight and Government Reform and the Government Accountability Office. The process of coordinating with the agency contacts and assessing whether the external face recognition systems are sufficiently accurate for use in support of FBI investigations is critical. Therefore, the CJIS Division is requesting an emergency processing to facilitate this task.

#### 8. Public Comments and Consultations:

The FBI sponsors and participates in training seminars, meetings, and conferences with the user community. These meetings are held regularly and provide an open forum to discuss matters of mutual concern. The FBI consults with the external partner agencies on an individual basis as needed. Additionally, the 30 and 60-day Notices of Information Collection will be published in the Federal Register.

#### 9. Payment of Gift to Claimants:

The FBI does not provide any payment or gift to respondents.

10. Assurance of Confidentiality:

Information requested in this collection may be considered confidential business information. Its release is governed by law, regulations, and agency procedures.

11. Justification for Sensitive Questions:

This collection does not include questions of a sensitive nature.

12. Estimate of Hour Burden:

Number of respondents	22
Frequency of response	One-time collection
Total annual responses	22
Hours per response	8 hours (this includes collecting the information not just responding to the questions).
Annual hour burden	176 hours

The Number of Respondents are based on:

The total annual responses is based on the number of external partner agencies which contain systems that require FBI review. The hours per response was an estimate based upon the information required within the response. The annual hour burden was determined by multiplying the number of respondents that will be contacted by the estimated time to read the form, then identifying the information requested and answer the questionnaire.

13. Estimate of Cost Burden:

Respondents will not incur any costs other than their time to respond. Respondents will not incur any capital, start up, or system maintenance costs associated with this information collection.

14. Estimated Annualized Costs to Federal Government:

Personnel Salaries:	\$ 385.36
Analysis of incoming information:	\$ 0
Conversion to electronic format:	\$ 0
Total Cost:	\$ 385.36
Conversion to electronic format:	\$ 0

Total Cost: \$ 385.36

The Cost of Conversion to electronic format and analysis is included in with the personnel salaries. To calculate an estimated expense for the federal government, the staff needed and the approximate time each would spend on the FACE External Repository Survey tasks, as a result of information gleaned from the FACE External Repository Survey were considered. It was estimated that approximately one FACE employee's time would be dedicated to items solely related to the FACE External Repository Survey. Therefore, approximately eight hours of the FACE employee's annual salary was calculated to produce the total estimated cost to the federal government.

FACE – One staff x 8 hours dedicated (used GS scale, step 5, to establish general salary)  
GS 13 \$ 385.36 (annual salary \$100,530.00 step five salary)

15. Reasons for Change in Burden:

NA.

16. Plans for Publication:

There are no plans to publish the information collected.

17. Expiration Date Approval:

As an emergency approval is being requested, the form will not contain an expiration date as this would likely be approved only after completion of the collection.

18. Exceptions to the Certification Statement:

There are no exceptions to the certification statement.

Part B. Statistical Methods

The FBI does not employ statistical methods in this information collection.