

SUPPORTING STATEMENT - PART A

Synchronized Predeployment and Operational Tracker Enterprise Suite (SPOT-ES)

OMB Control Number 0704-0460

Summary of Changes from Previously Approved Collection

- The burden has decreased since the previous approval due to contractor deployments to ongoing contingencies having been reduced since 2016. Thus, the number of responses required was reduced from 93,000 to 75,000.

1. Need for the Information Collection

The National Defense Authorization Act (NDAA) for Fiscal Year (FY) 2008, Public Law 110-181, Section 861, requires a common database between the Department of State (DoS), Department of Defense (DoD) and the United States Agency for International Development (USAID) to serve as the repository of information on contracts and contractor personnel performing in Iraq and Afghanistan. A 2010 Memorandum of Understanding between DoS, DoD and USAID designates the Synchronized Predeployment and Operational Tracker (SPOT) as that common database. Public Law 110-181, Section 862, requires a process for registering, processing, accounting for, and keeping appropriate records of personnel performing private security functions in an area of combat operation. Again, SPOT was selected as the common database for compliance. DoD Instruction 3020.41, Operational Contractor Support (OCS), states: "In applicable contingency operations, contractor visibility and accountability shall be maintained through a common joint database, the Synchronized Predeployment and Operational Tracker (SPOT)."

DoDI 3020.41 further requires SPOT to assist Combatant Commanders (CCDR) in maintaining awareness of the nature, extent, and potential risks and capabilities associated with OCS in support of contingency, humanitarian or peacekeeping operations, or military exercises as designated by the CCDR. DoDI 3020.41 outlines procedures for establishing, maintaining, and validating the SPOT common joint database to ensure accountability, visibility, force protection, medical support, personnel recovery, and other related support can be accurately forecasted and provided to deployed contractors as required.

Government contract companies are required to enter their employee's data into SPOT before contractors are deployed outside of the United States. SPOT is also used during Homeland Defense and Defense Support of Civil Authority Operations within the United States. This data collection on contractors is a condition of DoD contracts when DFARS 252.225-7040, Contractor Personnel Authorized to Accompany U.S. Armed Forces Deployed Outside the United States, is incorporated. This clause applies when contractors are authorized to accompany U.S. Armed Forces deployed outside of the United States in contingency, humanitarian or peacekeeping operations or other military operations/exercises when designated by the Combatant Commander. Any persons who

choose not to have data collected will not be entitled to employment opportunities which require this data to be collected.

Contractor personnel are required to have a Letter of Authorization (LOA) in their possession at all times when deployed, and SPOT is the only system that provides the LOA. The LOA is required to process through a deployment center and to travel to, from, or within designated operational areas. The LOA is required for access to authorized Government Services (AGS) which are assigned by the responsible Contracting Officer for each individual contractor IAW their contract as a part of the automated LOA process in SPOT. If the data is not collected to generate the LOA, contractors would not be able to obtain AGS in their deployed locations, including access to meals and lodging - limiting their ability to obtain critical life support. In their 2004 Memo, the Assistant Secretary of the Army for Acquisition, Logistics and Technology (ASA(ALT)) directed that their military, Department of Defense (DoD) civilians and government contractors are to be centrally managed and have chosen SPOT for this purpose. Information is collected on all three categories for this subset of DoD.

2. Use of the Information

In accordance with appropriate acquisition policy and regulations, DoS and USAID funded contractors supporting operations in Iraq and Afghanistan and all DoD awarded contracts that may potentially support contingency operations worldwide shall input employee data and maintain by-name accountability of contractor personnel in a designated database as specified in their contract. Currently, SPOT is the named system in these contractual requirements. Contractors are responsible for knowing the general location of their employees and ensuring the database contains up-to-date, near real-time information reflecting all personnel deployed or to be deployed in support of contingency, humanitarian, peacekeeping or disaster relief operations or as designated by the cognizant Combatant Commander. Prime contractors are responsible for ensuring the database, SPOT, or its successor, contains up-to-date, real-time information regarding their subcontractors at all tiers.

The Synchronized Predeployment and Operational Tracker Enterprise Suite (SPOT-ES) Information Collection begins with the announcement of a named contingency, humanitarian, peacekeeping or disaster relief operations or when designated by the Combatant Commander. Companies with contracts to provide support respond by documenting their employees who will deploy to the geographical area of responsibility (AOR) being impacted using their internal databases or company forms and the Department of Homeland Security's United States Citizenship and Immigration Services (USCIS) Form I-9, Instructions for Employment Eligibility Verification. This data is then entered into the SPOT Database, located at <https://spot.dmdc.mil><https://spot.dmdc.mil/>. Screen shots and dropdown options have been provided as part of the OMB Package. The Assistant Secretary of the Army for Acquisition Logistics and Technology (ASA(ALT)) populates the SPOT Database with data related to their civilian and military members. This is because these individuals travel to provide support for their specific program as opposed to traveling as part of a military unit.

Categories of individuals covered by the SPOT-ES System of Records Notice (SORN) are: DoD military personnel and civilian employees; DoD contractor personnel; DOS and USAID contractor personnel and civilian employees; Government civilian and contractor personnel of other Federal Agencies; and may also include private citizens when anyone in these categories are supporting military exercises, events, contingency, humanitarian assistance, peacekeeping, disaster relief operations, and other activities, missions or scenarios that require support within and outside of the United States (U.S.) as follows:

- a. Department of Defense (DoD) military personnel
- b. DoD civilian employees
- c. DoD contractor personnel
- d. Department of State (DOS) contractor personnel
- e. DOS civilian employees supporting contingency operations led by DoD or the DOS Office of Security Cooperation outside of the U.S.
- f. United States Agency for International Development (USAID) contractor personnel
- g. USAID civilian employees supporting contingency operations led by DoD or the DOS Office of Security Cooperation outside of the U.S.
- h. Government civilian and contractor personnel of other Federal Agencies, e.g., the Department of Interior, Department of Homeland Security, Department of Treasury, Department of Justice, Department of Health and Human Services, Environmental Protection Agency, Department of Transportation, Department of Energy, and General Services Administration
- i. Civilian organizations and private citizens, including first responders, who transit through a location where a Joint Asset Movement Management System (JAMMS) workstation is deployed.

The SORN also describes who, what, and why information regarding this data collection is required per the Privacy Act because SPOT-ES collects personally identifiable information (PII). This collection action is indicated in Figure 1 by the graphic showing hands on a computer labeled SPOT in the top left corner. The data collection fields are accessed by authorized users via the web and the responses are entered directly into the unclassified SPOT graphical user interface (GUI). There is a Privacy Act Statement portrayed on the web site as part of the login process every time any of the SPOT-ES products are accessed. Each SPOT User must confirm their agreement before they are allowed to proceed to the system. The information then collected is stored in the central contractor repository database as indicated by the SPOT NIPRNET database in the top center of Figure 1, below.

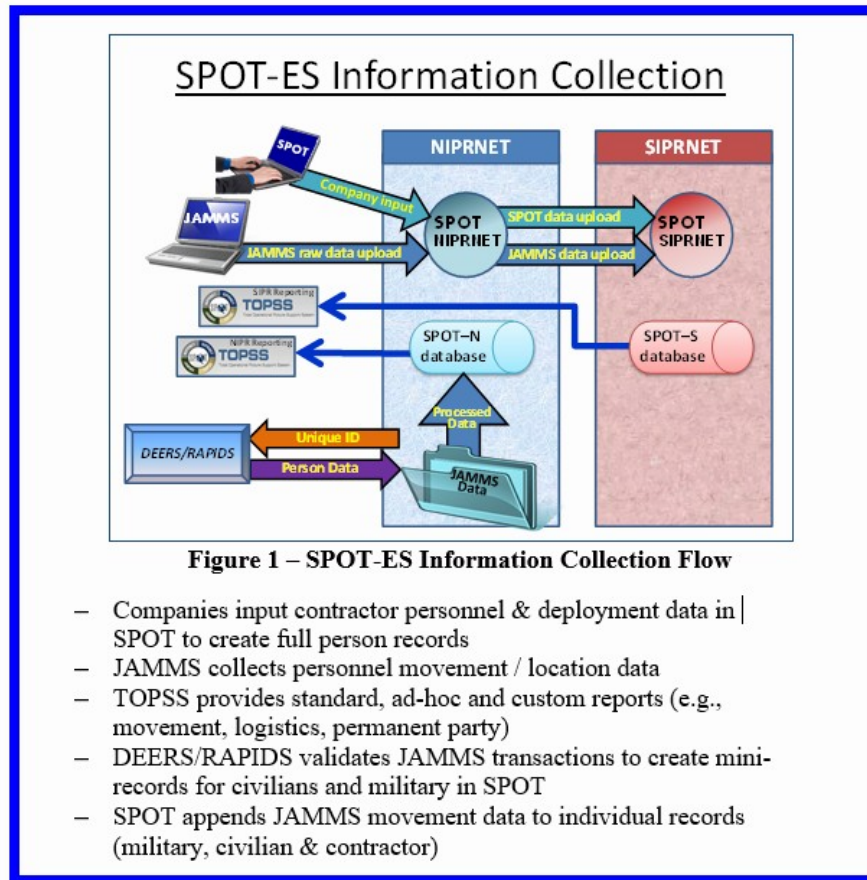


Figure 1 – SPOT-ES Information Collection Flow

The records stored in the SPOT database are then transported to the classified side (SIPR) where black programs may use existing data and enter additional data as required. As noted in Paragraph 1, the reason for collecting this information in the SPOT application is because Public Law 110-181, Section 861, requires a single central repository of contract and contractor information for deployees to Iraq and Afghanistan to be used by DoD, DOS and USAID. These three Agencies have designated SPOT as the single repository and authoritative source for contract and contractor information related to the Iraq and Afghanistan contingencies. Additionally, in their January 2008 memo, the Department of Defense provided time-phased implementation guidance for input of contractor data into SPOT such that all contractors employed on DoD-funded contracts being performed in support of contingency operations anywhere in the world be entered into SPOT by 30 September 2008 and continuing thereafter. ASA(ALT) uses this application so that they have a single source for visibility of all their deployed personnel assets (military, DoD civilians and contractors).

Once deployed, contractors scan their LOA at JAMMS workstations while military and civilians scan their Common Access Card (CAC) for access to dining facilities and other locations where government services are provided. JAMMS records the date and time that the specific individual is at a certain location consuming associated government services,

e.g., meals, flights, or billeting. The JAMMS scans are uploaded daily into the unclassified SPOT system. LOA scans are immediately appended to the existing contractor record in SPOT to indicate the specific location, date and time the individual transited the particular JAMMS workstation. CAC scans are processed via a web-service with the Defense Enrollment Eligibility Reporting System (DEERS) and the Real-Time Automated Personnel Identification System (RAPIDS) several times each day. This process sends the unique DoD ID number on each scanned CAC to DEERS/RAPIDS which returns personally identifiable information (PII), e.g., name and SSN to either build a new 'mini-record' or add to an existing mini-record.

The third SPOT-ES product is the Total Operational Picture Support System (TOPSS) which provides reports to authorized government users for planning and analysis. It is not currently accessible by contractor company representatives. Official notification for the information collection is not sent to the respondents. Applicable contracts contain DFARS Clause 252.225-7040, which requires the companies to respond.

3. Use of Information Technology

SPOT-ES is an entirely web-based system and 100% of the information gathered is collected 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

The data is collected one-time for each deploying contractor for each deployment. As the situation regarding their deployment changes, the record is updated until the individual re-deploys, i.e., leaves the area of operations. All information is collected electronically to reduce the burden of maintaining paper copies in accordance with Public Law 96-511, Section 94 Statute 2812. If this data is not collected and updated there is a risk that contractor personnel will be without the ability to obtain life support or personnel recovery services when placed in harm's way.

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 Wednesday, March 27, 2019. The 60-Day FRN citation is 84 FRN 11530.

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

A 30-Day Federal Register Notice for the collection published on Thursday, August 29, 2019. The 30-Day FRN citation is 84 FRN 45476.

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 not needed because the system does not collect information from the individual.

The Systems of Records Notice for this collection may be found online at the following link: <https://dpcl.d.defense.gov/Privacy/SORNsIndex/DOD-wide-SORN-Article-View/Article/570569/dmdc-18-dod/>.

The Privacy Impact Assessment for the Synchronized Predeployment and Operational Tracker Enterprise Suite (SPOT-ES) is published online at the following link: <https://www.dmdc.osd.mil/appj/dwp/documents.jsp>.

Records and Disposition Schedule:

Records are maintained permanently. All files are closed upon end of individual's deployment. They are transferred to the National Archives and Records Administration when 25 years old.

11. Sensitive Questions

Social Security Numbers are collected as part of the individual contractor records. A Social Security Number Justification Memo is included as part of the OMB submission package.

12. Respondent Burden and its Labor Costs

Part A: ESTIMATION OF RESPONDENT BURDEN

- 1) [SPOT-ES]
 - a) Number of Respondents: 964
 - b) Number of Responses Per Respondent: 77
 - c) Number of Total Annual Responses: 74,561
 - d) Response Time: 30 minutes
 - e) Respondent Burden Hours: 37,291 hours

Part B: LABOR COST OF RESPONDENT BURDEN

- 1) [SPOT-ES]
 - a) Number of Total Annual Responses: 74,561
 - b) Response Time: 30 minutes
 - c) Respondent Hourly Wage: \$32.11
 - d) Labor Burden per Response: \$16.055
 - e) Total Labor Burden: \$1,197,076.86

The Respondent hourly wage was determined by using the mean hourly wage for Human Resources Specialists (https://www.bls.gov/oes/current/oes_nat.htm).

13. Respondent Costs Other Than Burden Hour Costs

There are no annualized costs to respondents other than the labor burden costs addressed in Section 12 of this document to complete this collection.

14. Cost to the Federal Government

Part A: LABOR COST TO THE FEDERAL GOVERNMENT

- 1) [SPOT-ES]
 - a) Number of Total Annual Responses: 74,561
 - b) Processing Time per Response: 0.007 hours
 - c) Hourly Wage of Worker(s) Processing Responses : \$35.00
 - d) Cost to Process Each Response: \$0.245
 - e) Total Cost to Process Responses: \$18,267.45

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

Part C: TOTAL COST TO THE FEDERAL GOVERNMENT

- 1) Total Labor Cost to the Federal Government: \$18,267.45
- 2) Total Operational and Maintenance Costs: \$0
- 3) Total Cost to the Federal Government: \$18,267.45

15. Reasons for Change in Burden

The burden has decreased since the previous approval due to contractor deployments to ongoing contingencies having been reduced since 2016. Thus, the number of responses required was reduced from 93,000 to 75,000. This drove the associated calculations down for both respondents and Federal Government. The time required for respondents and Federal Government to complete their portion of work in SPOT for each deployment has remained the same.

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.