1**Supporting Statement A for**

Paperwork Reduction Act Submission

NATIONAL PARK SERVICE

BACKGROUND CLEARANCE INITIATION REQUEST

OMB Control Number 1024-0282

Terms of Clearance. None.

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

As delegated by the U.S. Office of Personnel Management (OPM), the National Park Service (NPS) is authorized to request information required to determine the suitability of applicants for Federal employment and non-Federal personnel (i.e., contractors, partners, etc.).

In line with regulations mandated by OPM and the Department of the Interior (DOI), NPS Personnel Security Branch utilizes the Electronic Questionnaires for Investigations Processing (e-QIP) System. e-QIP is a web-based automated system designed to facilitate the processing of standard investigative forms used when conducting background investigations for Federal security, suitability, fitness and credentialing purposes. e-QIP allows the user to electronically enter, update and transmit their personal investigative data over a secure internet connection to a requesting agency

The National Park Service uses Form 10-152, "Background Clearance Initiation Request" to collect the information needed to create e-QIP accounts. This information must be collected in order to initiate background investigations for all individuals requiring use of e-QIP and access to NPS property and/or receive a DOIAccess PIV badge.

Legal Authorities

- Executive Order 10450 - *Security requirements for Government employmen*t.
- Order 10577 - Amending the Civil Service Rules and authorizing a new appointment system for the competitive service
- 5 USC 3301 – *Civil Service; Generally*
- 5 USC 3302 – *Competitive Service; Rules*
- 5 USC 9101 – *Access to criminal history records for national security and other purposes*

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. Be specific. If this collection is a form or a questionnaire, every question needs to be justified.**

Applicants for federal employment will complete form 10-152. This includes non-federal personnel, contractors and individuals not otherwise directly employed by the Federal Government - those who perform work for or on behalf of the Federal Government and will require access to NPS property and/or receive a DOIAccess PIV badge.

The following information is collected from each proposed candidate requiring a background clearance:

- Full legal name
- Social Security Number
- Date and place of birth
- Country of citizenship
- Contact phone number
- Email address
- Home address

The form is also used to determine:

(1) Whether proposed candidate has ever been investigated by another federal agency; and

(2) If the candidate was investigated by another federal agency; they must provide the name of that agency and the date of the investigation.

Additional information is required on Form 10-152 for non-federal personnel includes:

- Name of proposed candidate's company
- Contract/agreement number
- Contract/agreement periods of performance

Each data segment on the form is necessary to create the e-QIP and DOIAccess accounts for each individual. Creation of these accounts is the first step in the process to initiate the background investigation and identity verification requirements before a DOIAccess PIV badge can be issued.

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 and specifically how this collection meets GPEA requirements.**

A hard copy version of the form is provided to new hires or contractors. The form is available electronically, by request, in a fillable/printable format. Completed forms can be either submitted electronically using encrypted email or hard copy via postal mail.

4. **Describe efforts to identify duplication. Show specifically why any similar information already available cannot be used or modified for use for the purposes described in Item 2 above.**

   There is no duplication. All information collected is specific to each applicant for federal and non-federal employment in order to initiate the background clearance process.

5. **If the collection of information impacts small businesses or other small entities, describe any methods used to minimize burden.**

   This collection does not affect small businesses or other small entities.

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.**

   This information is required on a one-time basis (per respondent) to initiate the appropriate background clearance. Without this information, the NPS Personnel Security Branch staff will be unable to create accounts in eQIP.

7. **Explain any special circumstances that would cause an information collection to be conducted in a manner:**
   * **requiring respondents to report information to the agency more often than quarterly;**
   * **requiring respondents to prepare a written response to a collection of information in fewer than 30 days after receipt of it;**
   * **requiring respondents to submit more than an original and two copies of any document;**
   * **requiring respondents to retain records, other than health, medical, government contract, grant-in-aid, or tax records, for more than three years;**
   * **in connection with a statistical survey that is not designed to produce valid and reliable results that can be generalized to the universe of study;**
   * **requiring the use of a statistical data classification that has not been reviewed and approved by OMB;**
   * **that includes a pledge of confidentiality that is not supported by authority established in statute or regulation, that is not supported by disclosure and data security policies that are consistent with the pledge, or which unnecessarily impedes sharing of data with other agencies for compatible confidential use; or**
   * **requiring respondents to submit proprietary trade secrets, or other confidential information, unless the agency can demonstrate that it has instituted procedures to protect the information's confidentiality to the extent permitted by law.**

   There are no special circumstances that would cause us to collect the information in a manner inconsistent with OMB guidelines.

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 in response to the PRA statement associated with the collection over the past three years, 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 three 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.

On October 4, 2019, we published in the Federal Register notice (84 FR 53174) our intent to request that OMB approve this information collection. In that notice, we solicited comments for 60 days, ending on December 3, 2019. We did not receive any comments in response to that Notice.

In addition to the Federal Register notice, we held a Strengthening Human Capital Management (HCM) Offsite meeting during November 5 – 7, 2019. The audience included Area Regional Directors, Park Superintendents, Human Resource Officers and Regional Security Specialist. This collaborative event focused on critical short-term and mid-term priorities with Human Resource transformation and Personnel Security. We established a shared understanding of the impact of the Clearance Initiation Request Form 10-152, communicated progress made to date, and solicited feedback on the following topics regarding the use of the form. The responses below are summaries of the comments and action items captured during the meeting.

A. ***Is the collection of information necessary, including whether or not the information will have practical utility; whether there are any questions they felt were unnecessary;***

Comment: All the participants agreed that in order to effectively manage the timely communication for Human Resource personnel, hiring managers and provide funding information, this form is practical.

NPS Response/Action Taken: The team requested continued feedback on new format or implementation guidance for future vetting. No changes made.

B. The accuracy of our estimate of the burden for this collection of information;

***Comment*:** The participants at the HCM Offsite agreed that the average burden of time of seven (7) minutes to complete the form is currently accurate.

***NPS Response/Action Taken**:* No changes made. Based on the average timeframe provided by the respondents and our experience administering this collection, we feel our estimate of 7 minutes per response is appropriate.

C. Ways to enhance the quality, utility, and clarity of the information to be collected;

Comment**:** *Will new users know how to use the form*?

NPS Response/Action Taken**:** A working group of Regional Security Specialist has been established to determine the competencies needed in the workforce. They will develop a training plan and skills needed across the security workforce.

D. Ways to minimize the burden of the collection of information on respondents.

Comment: Introduce new processes, resources, and approaches to establish increased efficiency and clarity of Security processes.

NPS Response/Action Taken: We will continue to streamline the application and submission process for the 10-152.

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

We do not provide payments or gifts to respondents.

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

We do not provide any assurance of confidentiality. The information is protected in accordance with the Privacy Act, and we will maintain the information in a secure system of records (Interior-DOI-45, "HSPD-12: Identity Management System and Personnel Security Files", 72 FR 11036).

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.

We do not ask questions of a sensitive nature.

12. Provide estimates of the hour burden of the collection of information. The statement should:

- **Indicate the number of respondents, frequency of response, annual hour burden, and an explanation of how the burden was estimated. Unless directed to do so, agencies should not conduct special surveys to obtain information on which to base hour burden estimates. Consultation with a sample (fewer than 10) of potential respondents is desirable. If the hour burden on respondents is expected to vary widely because of differences in activity, size, or complexity, show the range of estimated hour burden, and explain the reasons for the variance. Generally, estimates should not include burden hours for customary and usual business practices.**
- **If this request for approval covers more than one form, provide separate hour burden estimates for each form and aggregate the hour burdens.**
- **Provide estimates of annualized cost to respondents for the hour burdens for collections of information, identifying and using appropriate wage rate categories. The cost of contracting**

out or paying outside parties for information collection activities should not be included here.

We used Bureau of Labor Statistics News Release published on September 17, 2019 (USDL-19-1649) Employer Costs for Employee Compensation–June 2019 (https://www.bls.gov/news.release/ecec.nr0.htm) to calculate the total annual burden. Table 1 lists the hourly rate for all workers $36.61, including benefits.

We estimate that we will receive 6,500 annual responses totaling 758 annual burden hours. We estimate the dollar value of the burden hours is $27,750 (758 x 36.61). We believe our estimate of 7 minutes to complete an application reflects the average time to complete an application, including time for reviewing instructions, gathering and maintaining data, and completing and reviewing the form.

Table 12.1 Estimated Annual Hour Burden

Activity	Number of Annual Responses	Completion Time per Response (Minutes)	Total Annual Hours	Hourly Rate with Benefits	$ Value of Annual Burden Hours
NPS Form 10-955 “Background Clearance Initiation Request”	6,500	7	758	$36.61	$27,750

13. Provide an estimate of the total annual non-hour cost burden to respondents or recordkeepers resulting from the collection of information. (Do not include the cost of any hour burden already reflected in item 12.)

* **The cost estimate should be split into two components: (a) a total capital and start-up cost component (annualized over its expected useful life) and (b) a total operation and maintenance and purchase of services component. The estimates should take into account costs associated with generating, maintaining, and disclosing or providing the information (including filing fees paid for form processing). Include descriptions of methods used to estimate major cost factors including system and technology acquisition, expected useful life of capital equipment, the discount rate(s), and the time period over which costs will be incurred. Capital and start-up costs include, among other items, preparations for collecting information such as purchasing computers and software; monitoring, sampling, drilling and testing equipment; and record storage facilities.**
* **If cost estimates are expected to vary widely, agencies should present ranges of cost burdens and explain the reasons for the variance. The cost of purchasing or contracting out information collection services should be a part of this cost burden estimate. In developing cost burden estimates, agencies may consult with a sample of respondents (fewer than 10), utilize the 60-day pre-OMB submission public comment process and use existing economic or regulatory impact analysis associated with the rulemaking containing the information collection, as appropriate.**
* **Generally, estimates should not include purchases of equipment or services, or portions thereof, made: (1) prior to October 1, 1995, (2) to achieve regulatory compliance with requirements not associated with the information collection, (3) for reasons other than to provide information or keep records for the government, or (4) as part of customary and usual business or private practices.**

There are no non-hour burden costs.

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 expense that would not have been incurred without this collection of information.

The annual cost to the Federal Government to administer this information collection is approximately $1,021,280 (rounded) (6,500 applications x $157.12 (weighted average from below).

To determine hourly wage rates, we used the Office of Personnel Management Salary Table 2019-RUS (https://www.opm.gov/policy-data-oversight/pay-leave/salaries-wages/salary-tables/19Tables/html/RUS_h.aspx) as an average nationwide rate. The benefits rate was obtained from the Bureau of Labor Statistics News Release published on September 17, 2019(USDL-19-1649 Employer Costs for Employee Compensation–June 2019 (https://www.bls.gov/news.release/ecec.nr0.htm)

Table 14.1 Estimated Weighted Annualized Cost to the Federal Government

Position (Grade/Step)	Hourly pay rate	Hourly rate including benefits (1.6 x hourly rate)	Time Spent on Collection	Weighted average	Number of Positions	Total Cost to the Gov't per Submission
Security Officer GS-14/05	$56.92	$91.07	15%	$13.66	1	$13.66
Human Resource Specialist GS-11/05	33.80	54.08	100%	54.08	1	54.08
Security Specialist GS-09/05	27.93	44.69	100%	44.69	2	89.38
				Cost per Submission		**$157.12**

15. Explain the reasons for any program changes or adjustments in hour or cost burden.

There are no programmatic changes at this time.

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.

We do not publish this information.

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.

We will display the OMB control number and expiration date on forms and other appropriate materials.

18. Explain each exception to the certification statement.

There are no exceptions to the certification statement.