

## Supporting Statement for Paperwork Reduction Act Submissions

Revision of a currently approved collection for the former Applicant Information Form which has been modified to Identity History Summary Request Form (1-783) to better align the form title with the program.

**OMB Control # 1110-0052**

The most recent version of this form is dated June 1, 2020.

### Part A. Justification

#### 1. Necessity of Information:

The regulations under 28 United States Code (U.S.C.) 534, which authorizes the FBI's acquisition, retention, and sharing of information, does not prohibit the subjects of arrest and conviction records from having access to those records. Therefore, Title 28 Code of Federal Regulation (CFR) Part 16 was amended to include §16.30-16.34, which contains the regulations of the FBI concerning procedures to be followed when the subject of an identification record requests production of that record to review it or to obtain a change, correction, or update to that record. The collection of information on this form is necessary to conduct an accurate and timely search of an individual's identity history information or to prove that such a record does not exist.

#### 2. Needs and Uses:

The Identity History Summary Request Form (1-783) is utilized to collect information necessary to process an individual's request for their identity history information. The form is used to collect the individual's name and date of birth (DOB), both of which are required for a fingerprint search. Although the name and DOB are collected on the fingerprint card, it is essential to have the name and date of birth on the 1-783 form to ensure accuracy and/or resolve any discrepancies associated with the name and DOB. The form is used to collect the mailing address of an individual to ensure the fingerprint search results are mailed to the correct address to avoid potential occurrences of Personally Identifiable Information (PII) breaches. Contact information, such as telephone number and/or e-mail address, is requested in case additional information or clarification is required for processing. The number of copies requested is collected on the form to ensure the customer receives the appropriate number of fingerprint search results. The form requires the individual's signature for validation purposes and for cases where the results are to be mailed to a different address other than the address of the customer. To further assist with ensuring accuracy and/or resolving any discrepancies associated with identities the following modifications were made: The U.S. Citizen/Legal Permanent Resident (LPR) field is now mandatory and the sex and race field was added. To simplify the form and remove all unnecessary fields the following fields have been deleted or modified: The height, weight, hair and eye color fields have been deleted, additional line was added to the address field, "Applicant Home" was modified to state "home address", the "mail results to address" has been deleted, the "reason for request" field has been deleted, the FBI address and mailing instructions were bolded, the Identity History Summary request information was expanded to

provide more detail regarding the purpose for requesting a copy of your Identify History, and the privacy statement was modified/moved from the top of the form to the bottom and a paperwork reduction statement was added.

### 3. Use of Technology:

The 1-783 has been partially automated due to the development of the Electronic Departmental Order (eDO). The eDO provides the opportunity for individuals to enter their descriptive data into fillable forms, submit payment for the Departmental Order process via a secure payment vehicle, and retrieve fingerprint search results from a secure website. However, the paper 1-783 is still accepted and for processing.

### 4. Efforts to Identify Duplication:

The FBI is the only federal agency authorized to conduct the identity history summary request for the data from this information collection.

### 5. Methods to Minimize Burden on Small Businesses:

Small businesses will not be affected by this collection.

### 6. Consequences of Less Frequent Collection:

The 1-783 is necessary with every identity history summary request from an individual in order to ensure accurate and timely processing. The form is utilized to collect information, such as name, DOB, mailing address, contact information, number of copies needed, and individual's signature, which are all pertinent in either the fingerprint search process or the process of mailing the results to the customer. Failure to collect information on the form would result in the inability to complete the request.

### 7. Special Circumstances Influencing Collection:

Title 28 CFR Part 16, Subpart C regulates the production of FBI Identification Records in response to written requests by subjects thereof. By order dated September 24, 1973, the Attorney General of the United States directed the FBI publish rules for the dissemination of arrest and conviction records to the subjects of such records upon request. This order resulted from a determination that 28 U.S.C. 534 does not prohibit the subjects of arrest and conviction records from having access to those records. In accordance with the Attorney General's order, the FBI will release to the subjects of identification records copies of such records upon submission of a written request, satisfactory proof of identity of the person whose identification record is requested, and a processing fee.

### 8. Public Comments and Consultations:

The FBI website, <[www.fbi.gov](http://www.fbi.gov)> provides thorough information relating to the regulations and

the process for which an individual may obtain their own identification record. Additionally, the 30 and 60-day Notices of Information Collection was published in the Federal Register and no comments was received.

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	125,000	
Frequency of response		as needed
Total annual responses	125,000	
Minutes per response	5	minutes
Annual hour burden	10,417	hours

Note: The time required to process these requests increased from three minutes to five minutes from previous OMB approval. There was an error in calculating the processing time in previous collection, which has now been corrected. The response time remains five minutes regardless of modifications to form. The implementation of the Electronic Departmental Order (eDO), which allows the customer to submit requests and receive responses electronically, created numerous efficiencies and streamlined/eliminated manual processes, which removed the burden of processing the applicant information form from the DO employee for any DO request submitted electronically. Currently, of the number of DO requests submitted, approximately 65% are electronic and 35% are paper.

13. Estimate of Cost Burden:

Respondents must include an \$18 fee for each copy requested of their personal identity history summary as indicated on the 1-783. Respondents will not incur any capital, start up, or system maintenance costs associated with this information collection.

14. Estimated Annualized Costs to Federal Government:

Note: The annualized costs provided below for the Analysis and Conversion incorporates

personnel salaries involved with those specific processes.

Personnel Salaries: \$ \$119,750

Analysis of incoming information: \$149,687

Conversion to electronic format: \$29,938

Total Cost: \$299,375

Personnel Salaries: \$119,750 – This would be the DO Mail Opening process. It is estimated that it takes approximately 2 minutes to open the mail, analyze the contents, and make a determination for processing. Approximately 125,000 pieces of mail are received yearly with applicant information forms. Average DO employee salary is \$45,631 + \$14,145 for 31% benefits = \$59,776 divided by 2,080 hours worked per year = \$28.74 per hour; 125,000 pieces of mail x 2 min = 250,000 minutes divided by 60 minutes = 4,166.67 hours x \$28.74 = \$119,750 annual cost the government.

Analysis of incoming information - \$149,687 – This would be the DO Logging process. It is estimated that it takes approximately 2.5 minutes to log the applicant information form for a DO request. Approximately 125,000 applicant information forms are logged yearly for DO requests. Average DO employee salary is \$45,631 + \$14,145 for 31% benefits = \$59,776 divided by 2,080 hours worked per year = \$28.74 per hour; 125,000 applicant information forms logged x 2.5 min = 312,500 minutes divided by 60 minutes = 5,208.33 hours x \$28.74 = \$149,687 annual cost the government.

Conversion to electronic - \$29,938 – This would be the DO Scanning process. It is estimated that it takes approximately 30 seconds to scan the applicant information form into electronic format. Approximately 125,000 applicant information forms are scanned yearly for DO requests. Average DO employee salary is \$45,631 + \$14,145 for 31% benefits = \$59,776 divided by 2,080 hours worked per year = \$28.74 per hour; 125,000 applicant information forms scanned x 30 seconds = 62,500 minutes divided by 60 minutes = 1,041.67 hours x \$28.74 = \$29,938 annual cost the government.

Total Cost - \$299,375 – Added costs for receiving hard copy applicant information form, processing the applicant information form, and scanning the applicant information form into electronic format. Above are the total costs associated with process the 1-783 forms. With the

enhancements to the eDO system, processing is electronic and have significantly decreased the cost to the government.

15. Reasons for Change in Burden:

No change in burden from previous OMB approval.

16. Plans for Publication:

There are no plans to publish the information collected.

17. Expiration Date Approval:

Due to the administrative burdens related to replacing expired forms when no information on those forms has been changed, the FBI is requesting approval to not display the expiration date for OMB approval of the information collected.

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.