

Department of Justice

Bureau of Alcohol, Tobacco, Firearms and Explosives
Information Collection Request

Supporting Statement

OMB 1140-0058

Investigator Quality Survey - ATF Form 8620.7

A. JUSTIFICATION

1. Necessity of Information Collection

Pursuant to the Memorandum of Understanding (MOU) between the Bureau of Alcohol, Tobacco, Firearms and Explosives (ATF) and the Office of Personnel Management (OPM), dated March 3, 2000, ATF is authorized to use its Federal or contract investigators to conduct personnel security and suitability background investigations and periodic reinvestigations. Investigations are conducted on applicants and employees in competitive service positions, as well as candidates, contractors, Task Force Officers (TFOs), or volunteers/interns in ATF service provider positions. All personnel security investigations are conducted in accordance with the Intelligence Reform and Terrorism Prevention Act of 2004, 5 C.F.R. Part 736, and Executive Orders 13467 and 13764. Per Executive Order 12968, each investigator must have a favorably adjudicated national security, critical sensitive clearance that meets the OPM requirements, prior to performing investigative assignments. Contract investigators are required to complete the same level of background screening and re-screening as Federal investigators.

In accordance with the MOU, ATF must also maintain an "Investigator Integrity Follow-up Program," to ensure that contract investigators are conducting their duties in accordance with the 2012 Federal Investigative Standards. The Investigator Quality Survey - ATF Form 8620.7 was created as part of this follow-program, and is currently used to ensure that ATF contract investigators conduct themselves professionally, while performing their investigative duties.

ATF requests approval to make the following changes to OMB 1140-0058 (Investigator Quality Survey - ATF Form 8620.7):

- The name of this IC is being changed from *Investigator Integrity Questionnaire* to *Investigator Quality Survey*.
- Electronic completion and submission of the form.

- Type of interview question expanded to include “Virtual” interview.
- Interview schedule question now includes “Randomly Contacted.”
- Question 5 added – When the interview ended, did you have sufficient information to contact the investigator if necessary (i.e., name and email address/telephone number)?
- Question 7 added – Provide the number of times you were contacted by the investigator after the interview and the reasons for the contact(s). (Previous version of form requested this information as part of another question.)
- Question 14 added - The length of the interview was sufficient to thoroughly address each topic – “yes” or “no” response.
- Updated Privacy Act Statement – References to Executive Orders 10450 and 12968 were replaced with Executive Orders 13764 and 13467.

2. Needs and Uses

ATF Personnel Security Program Managers or their designees will randomly solicit feedback from persons who have been interviewed by ATF contract investigators, using the Investigator Quality Survey - ATF Form 8620.7. The respondent will receive the survey and instructions for completion by email, and will be required to verify that contract investigators are conducting interviews in a professional manner, in accordance with prescribed policies. Specifically, policy requirements regarding conducting interviews include scheduling appointments in advance and informing respondents about the Privacy Act rights of the individual under investigation. Investigators must also present a professional appearance, properly identify him/herself, professionally conduct interview(s), and provide post-interview contact information.

3. Use of Information Technology

The Investigator Quality Survey- ATF Form 8620.7 is available for electronic completion. Personnel Security Division (PSD) personnel will email the form to the respondent and request feedback regarding a recent interview with an ATF contract investigator. Once the respondent electronically completes the survey, he/she will submit the form via email, to the designated ATF email inbox.

4. Efforts to Identify Duplication

ATF uses a uniform subject classification system to identify duplication and to ensure that any similar information already available cannot be used or modified for use for the purpose of this information collection.

5. Minimizing Burden on Small Businesses

This information collection has no effect on small businesses. The information sought is in response to a voluntary interview in which an individual participated, during a Federal background investigation. The purpose of creating a record is to document a contractor's performance while conducting their investigative duties.

6. Consequences of Not Conducting or Less Frequent Collection

ATF utilizes contract investigators to conduct security/suitability investigations about prospective or current ATF employees, as well as those contractors and consultants doing business with ATF. The use of contract investigators to conduct personnel security/suitability interviews, allows ATF to dedicate its Federal investigators to combating crime. Without this information collection, ATF would be unable to obtain public feedback about personnel security/suitability investigations.

7. Special Circumstances

This information collection requirement is consistent with the intent of the MOU requiring that ATF implement an "Investigator Integrity Follow-up Program," to ensure that contract investigators are conducting investigations in accordance with the 2012 Federal Investigative Standards. Respondents may voluntarily participate in this survey. There are no special circumstances causing this information collection to be conducted in a different manner, including but not limited to:

- Requiring respondents to report information to ATF more often than quarterly;
- Requiring respondents to prepare a written response in fewer than 30 days after receipt of the questionnaire;
- Requiring respondents to submit more than an original of any document;
- Requiring respondents to retain any records;
- Requiring the use of any statistical data;
- Requiring any pledge of confidentiality; or
- Requiring respondents to submit any proprietary or trade secrets.

8. Public Comments and Consultations

OPM representatives were consulted during the creation of this information collection. No comments were received during the 60-day Federal Register notice period. However, a 30-day notice will be published in the Federal Register to solicit public comments.

9. Provision of Payments or Gifts to Respondents

No decision of payment or gift is associated with this information collection.

10. Assurance of Confidentiality

Confidentiality is not assured. Information collected by the PSD is protected by the Privacy Act of 1974 and will not be released to outside parties, unless authorized as set forth in the Privacy Act of 1974.

11. Justification for Sensitive Questions

The survey does not include questions of a sensitive nature. However, questions concerning the behavior and degree of professionalism of the contract investigator are asked.

12. Estimate of Respondent's Burden

It is anticipated that 2,500 respondents will complete this form annually. Each respondent will respond one time. It is estimated that it takes 5 minutes to complete the form. The total number of annual burden hours associated with this collection is 208 hours.

13. Estimate of Cost Burden

There is no new cost associated with this information collection since all requests will be electronically submitted.

14. Cost to Federal Government

There is no cost to the Federal Government.

15. Reason for Change in Burden

There are no program changes or adjustments associated with this collection.

16. Anticipated Publication Plan and Schedule

ATF will not publish this information collection.

17. Display of Expiration Date

ATF is not requesting approval to omit the expiration date for this information collection.

18. Exception to the Certification Statement

There are no exceptions to the Certification Statement.

B. COLLECTIONS OF INFORMATION EMPLOYING STATISTICAL METHODS

None