

## SUPPORTING STATEMENT - PART A

Standard Form (SF) 87 Fingerprint Charts – 0705-0002

### Summary of Changes from Previously Approved Collection

- *On September 30, 2019, as authorized by Executive Order 13869, the missions, records, and personnel of the Office of Personnel Management (OPM), National Background Investigations Bureau (NBIB), transferred to the Defense Counterintelligence and Security Agency (DCSA). The legacy SF 87, Fingerprint Card (OMB#3206-0150) was included in this transfer. This revision serves to notify the public of this transfer as well as the non-substantive format changes.*
- *This is not a new collection. The SF 87 form includes a new OMB# 0705-0002. All references to OPM or NBIB have been removed from the form. Questions about the collection and the public burden should be directed to the Department of Defense (DoD), Washington Headquarters Services. DCSA proposes a format update to the Race collection block per OMB Policy Directive No. 15. Revisions to instruments including adding new ICs, removing ICs or any major revisions to a previously approved IC (such as adding/removing SSN)*
- *Decrease in burden due to increases in electronic collection of fingerprints*
- *The SF 87 is being submitted as a Common Form and DCSA is therefore only reporting the burden imposed by DoD agencies. Other using agencies will be informed of this change so that they know to report their own burden.*

### 1. Need for the Information Collection

The SF 87 is completed by applicants as the basis of a criminal history check to establish that an individual is suitable for Federal employment or should be granted a security clearance. Executive Order 10450, as amended, requires that investigations be conducted on all persons entering Federal service. E.O. 10450, as amended, also requires that each investigation include a check of the Federal Bureau of Investigation's (FBI) fingerprint files to identify any criminal records on the subject. Although roughly 60% of all submissions are received electronically, the need remains to conduct checks based on hardcopy requests when electronic means are not available.

Solicitation of the information, including the Social Security number, is authorized pursuant to Section 925 of Public Law 115-91; Executive Orders 8781, and 9397 as amended, and Executive Order 13467 as amended by Executive Order 13869.

The Defense Counterintelligence and Security Agency (DCSA) is authorized to collect the information.

### 2. Use of the Information

The SF 87 is a fingerprint card, which is utilized to conduct a national criminal history check, which is a component of the background investigation. The SF 87 is a hardcopy form completed in ink, and returned by mail to the DCSA Federal Investigation Processing Center by requesting agencies or applicants who are under consideration for Federal employment; by Federal employees, to determine whether they should be retained in such employment; by individuals being considered to perform work for the Federal Government under a Government contract or to continue such work; and by persons seeking long-term access to Federal facilities and systems. The SF 87 fingerprint chart is used in background investigations to help establish facts required to determine, for example, whether the subject of the investigation should be adjudicated to be eligible for logical and physical access to Government facilities and systems; suitable or fit for Federal employment; fit to perform work on behalf of the Federal Government under a Government contract; eligible to hold a position that is sensitive for national security reasons; or eligible for access to classified information. The SF 87 form is utilized only when a hardcopy fingerprint chart must be obtained, as opposed to the electronic collection of fingerprints.

3. Use of Information Technology

DCSA encourages electronic collection of fingerprints and notes annual increases in electronic submissions. The SF 87 chart is utilized only when a hardcopy fingerprint must be obtained (e.g. security offices do not possess electronic fingerprinting capabilities.) The SF 87 charts are converted to images and transmitted to the FBI Criminal Justice Information Services (CJIS) electronically via OPM's Fingerprint Transmission System (FTS).

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 Federal Government's ability to conduct effective background investigations process would be compromised as the SF 87 is essential to conducting a timely and accurate national criminal history check, which is a key component of the background investigation. Use of the SF 87 is limited only to situations where electronic collection of fingerprints cannot be utilized.

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 Monday, September 14, 2020. The 60-Day FRN citation is 85 FRN 56591.

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

A 30-Day Federal Register Notice for the collection published on Monday, December 1, 2020. The 30-Day FRN citation is 85 FRN 77186.

## 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

This collection does require a Privacy Act Statement. The Privacy Act Statement is written in text, on the backside (page two) of the actual fingerprint card, and present there for the respondent to read. Respondents are advised to also review the FBI's Privacy Act Statement here: <https://www.fbi.gov/services/cjis/compact-council/privacy-act-statement>

The information collected will be shared with the Federal Bureau of Investigation, and may be shared by DCSA as a routine use with other government agencies, and commercial entities as part of a background investigation conducted to verify your identity, for any of the purposes associated with personnel vetting; and, for other purposes permitted under subsection (b) of the Privacy Act of 1974, as amended (5 USC §552a). The applicable system of records notice is: Department of Defense Personnel Vetting Records System, "DUSDI 02-DoD", at <https://dpcl.d.defense.gov/Portals/49/Documents/Privacy/SORNs/OSDJS/DUSDI-02-DoD.pdf>.

A draft copy of the PIA, Fingerprint Transaction System (FTS), has been provided with this package for OMB's review.

The applicable Records Retention Schedule and Disposition Schedule is: DAA-0478-2012-0003

### 11. Sensitive Questions

A SSN Justification Memo is included in the package for this collection. It details the applicable Acceptable Use Cases in accordance with DoDI 100.30.

Question asking for race/ethnicity of respondent is in compliance with OMB's current standards.

## 12. Respondent Burden and its Labor Costs

### Part A: ESTIMATION OF RESPONDENT BURDEN

- 1) Collection Instrument(s)  
SF 87, Fingerprint Chart
  - a) Number of Respondents: 20,491
  - b) Number of Responses Per Respondent: 1
  - c) Number of Total Annual Responses: 20,491
  - d) Response Time: 5 minutes
  - e) Respondent Burden Hours: 1,707.6 hours
  
- 2) Total Submission Burden (Summation or average based on collection)
  - a) Total Number of Respondents: 20,491
  - b) Total Number of Annual Responses: 20,491
  - c) Total Respondent Burden Hours: 1,708 hours

### Part B: LABOR COST OF RESPONDENT BURDEN

- 1) Collection Instrument(s)  
SF 87, Fingerprint Chart
  - a) Number of Total Annual Responses: 20,491
  - b) Response Time: 5 minutes
  - c) Respondent Hourly Wage: \$10.80
  - d) Labor Burden per Response: \$0.90
  - e) Total Labor Burden: \$18,441.90
  
- 2) Overall Labor Burden
  - a) Total Number of Annual Responses: 20,491
  - b) Total Labor Burden: \$18,442

Hourly wage for respondent is based on Executive Order (EO) 13658. Approximate Service Contract Act hourly minimum wage of \$10.80.

## 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) Collection Instrument(s)  
SF 87, Fingerprint Chart
  - a) Number of Total Annual Responses: 20,491
  - b) Processing Time per Response: .1 hours
  - c) Hourly Wage of Worker(s) Processing Responses: \$10.80
  - d) Cost to Process Each Response: \$1.08
  - e) Total Cost to Process Responses: \$22,130.28
  
- 2) Overall Labor Burden to the Federal Government
  - a) Total Number of Annual Responses: 20,491
  - b) Total Labor Burden: \$22,130

Part B: OPERATIONAL AND MAINTENANCE COSTS

- 1) Cost Categories
  - a) Equipment: \$0
  - b) Printing: \$7,700
  - c) Postage: \$0
  - d) Software Purchases: \$0
  - e) Licensing Costs: \$0
  - f) Other: \$0
  
- 2) Total Operational and Maintenance Cost: \$7,700

Part C: TOTAL COST TO THE FEDERAL GOVERNMENT

- 1) Total Labor Cost to the Federal Government: \$22,130
  
- 2) Total Operational and Maintenance Costs: \$7,700
  
- 3) Total Cost to the Federal Government: \$29,830

15. Reasons for Change in Burden

The burden has decreased since the original approval of this collection in December 2017 due to increases in electronic collection of fingerprints.

16. Publication of Results

The results of this information collection will not be published.

17. Non-Display of OMB Expiration Date

DCSA is 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"

DCSA is not requesting any exemptions to the provisions stated in 5 CFR 1320.9.