

SUPPORTING STATEMENT - PART A

Police Dispatch and Investigatory Records (OMB Control Number 0704-0522)

1. Need for the Information Collection

The Pentagon Force Protection Agency (PFPA) requires collection of information from members of the public during the course of investigating criminal or suspicious activity incidents and medical responses in order to positively identify respondents and collect information pertinent to the medical assistance and investigation and/or criminal prosecution of persons involved. This information can include an individual's Social Security Number (SSN) to differentiate him/her from another person with the same name and birthdate. PFPA is denoted a law enforcement agency under DODD 5105.68, section 4 "PFPA shall provide force protection, security, and law enforcement to safeguard personnel, facilities, infrastructure, and other resources for the Pentagon Reservation and for assigned DoD activities and DoD-occupied facilities within the National Capital Region (NCR)". The requirements for recording incident events and the use of a software-based records management system are described at length in the National Fire Protection Association (NFPA) Standard 1221-2013. The acceptable collection of SSN's by law enforcement agencies for interoperability with organizations beyond the Department of Defense or operational necessities are stated in DODI 1000.30, August 1, 2012. The Secretary of Defense designated PFPA to perform law enforcement functions on the Pentagon Reservation according to 10 USC 2674.

2. Use of the Information

Responders will use this actionable information to make time-critical decisions and support operations and exchange of data across responder Directorates. The Computer Aided Dispatch and Record Management System (CAD/RMS) is used to develop reports on groups and individuals that have harmed, or have attempted harm; made direct or indirect threats; have a specific interest in Office of the Secretary of Defense (OSD) High Risk Personnel, the DoD workforce, or the Pentagon Facilities; or have engaged in organized criminal activity such as gangs, drugs, and illegal immigration that would impact the Pentagon Facilities.

In the event a PFPA Pentagon Police Department (PPD) Officer collects information from a member of the public while on duty with the intent of inputting the data into the Computer Aided Dispatch and Investigatory Records application, the PFPA PPD Officer will verbally provide

the individual the PFPA Privacy Act Statement and Agency Disclosure Notice which is provided as part of this package.

Data are input directly into the database by PFPA Pentagon Police Department (PPD), Response, and Dispatch personnel. The application provides open text fields and drop-down options for inputting non-standard and standard data, respectively. Only PFPA personnel with an active CAD/RMS account and DoD-issued Common Access Card (CAC) can access the data and update reports. All modifications to reports are tagged with a date/time stamp and the PFPA personnel's identity.

These reports are maintained for the period of time allowed by their disposition, then discarded. Each record is assigned an expiration date once closed. Non-criminal records are discarded from the database (i.e., destroyed) one year after the case is closed. Criminal records are cut off when a case is closed and files, both electronic and hard copies, are destroyed 15 years after the cut-off. While active, these reports may be used in an investigation or as part of a case report submitted to the courts. Upon request, this data may be submitted to a vetted 3rd party such as an insurance agent or other law enforcement agency.

3. Use of Information Technology

100% of the information entered is submitted 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

All data collected in the CAD/RMS by PFPA personnel result from daily medical, criminal, and suspicious activities occurring on the Pentagon and its leased facilities by PFPA personnel directly involved in the incidents. Daily investigation of incidents and resulting data collection must be accomplished by PFPA or PFPA would be less able to complete its mission to provide force protection, security, and law enforcement to safeguard personnel, facilities, infrastructure, and other resources for the Pentagon Reservation and for assigned DoD activities and DoD-occupied facilities within the NCR. Data from members of the public is collected only by PFPA

PPD Officers as incidents occur and the frequency is not under the control of any PFPA personnel.

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. A 60-Day Federal Register Notice was published in the Federal Register on Friday 11/27/2020. The 60-Day FRN Citation is 85 FRN 76,067. No comments were received.
- b. A 30-Day Federal Register Notice was published in the Federal Register on Tuesday 1/19/2020. The 30-Day FRN Citation is 86 FRN 5153. No comments have yet been received.

Part B: CONSULTATION

b. PFPA had been in frequent contact with external federal, state, and local law enforcement agencies to determine the most effective and efficient method of collecting and managing law enforcement data. PFPA used this information to weigh the costs and benefits of automated versus manual records management practices. PFPA personnel utilize industry standard questioning practices in line with those used by law enforcement and responder agencies across the country. No respondents (i.e., persons questioned as the result of a criminal, medical, or suspicious activity incident) have been consulted regarding the methods by which the Agency collects and maintains respondents' information. These respondents are the focus of law enforcement investigations of incidents occurring on Department of Defense property of which they were a party to and cannot be assumed to possess any expertise regarding effective and efficient data collection or management.

9. Gifts or Payment

No payments or gifts are being offered to respondents as an incentive to participate in the collection.

10. Confidentiality

The System of Records Notice (SORN) for the CAD/RMS (DPFPA 05, “Interact Computer Aided Dispatch and Records Management System”) is currently being revised. A draft copy has been provided with this package for OMB’s review. The currently approved version can be found on the DPCLTD website: <https://dpcltd.defense.gov/Privacy/SORNsIndex/DOD-wide-SORN-Article-View/Article/570774/dpfpa-05/>.

A draft copy of the Privacy Impact Assessment (PIA) has been provided with this package for OMB’s review.

11. Sensitive Questions

The data collected by PFFPA personnel from the public includes information relevant only to the respondent(s) involved in the incident and actions observed and executed by PFFPA personnel, although some of the information, e.g., race and ethnicity, is considered to be sensitive. Regarding ethnicity and race, PFFPA uses categories compliant with those used by the National Crime Information Center (NCIC) and National Incident-Based Reporting System guidelines and standards. Information sharing is essential to providing force protection, security, and law enforcement and therefore PFFPA must follow the standards set forth by the larger federal Law Enforcement Agency (LEA) community. As a federal LEA, PFFPA is required to provide data that is interoperable with the FBI's NCIC by DODI 1000.30, which dictates rules for police department reporting. The language used in the CAD/RMS application reflects the standard language used by the federal LEA database, the National Crime Information Center, which was developed and is managed by the FBI (60 FR 19775). The FBI chose the language it uses in the NCIC to comply with OMB Directive 15 minimum standards, but also to define a set of values that will be of descriptive value to the criminal justice community.

In addition, SSN is collected from respondents, and a SSN justification is included as part of this submission package. Information not relevant to the investigation of an incident is not collected.

12. Respondent Burden and its Labor Costs

Part A: ESTIMATION OF RESPONDENT BURDEN

1) Collection Instrument(s)

Police Dispatch and Investigatory Records

- a) Number of Respondents: 693
- b) Number of Responses Per Respondent: 1
- c) Number of Total Annual Responses: 693
- d) Response Time: 20 min

- e) Respondent Burden Hours: 231 hours
- 2) Total Submission Burden
 - a) Total Number of Respondents: 693
 - b) Total Number of Annual Responses: 693
 - c) Total Respondent Burden Hours: 231 hours

Part B: LABOR COST OF RESPONDENT BURDEN

(P): OMB believes that everyone's time is worth money. In this section, we're determining that if the respondent was working at their job, how much would they make in the time it takes them to respond to the collection instrument?

If respondents are salaried, and not hourly wage-earners, approximate the hourly wage as best as possible. For a good estimate, divide respondent salary by 52 weeks, then divide again by 40 hours to come up with a respondent hourly wage.

- 1) Collection Instrument(s)
Police Dispatch and Investigatory Records
 - a) Number of Total Annual Responses: 693
 - b) Response Time: 20 min
 - c) Respondent Hourly Wage: \$51/hour
 - d) Labor Burden per Response (*P: B multiplied by C*): \$17
 - e) Total Labor Burden (*P: A multiplied by B multiplied by C*): \$11,781
- 2) Overall Labor Burden
 - a) Total Number of Annual Responses: 693
 - b) Total Labor Burden: \$11,781

The Respondent hourly wage was determined by using the [Department of Labor Wage Website] ([<http://www.dol.gov/dol/topic/wages/index.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) Collection Instrument(s)
Police Dispatch and Investigatory Records
 - a) Number of Total Annual Responses: 693
 - b) Processing Time per Response: 25 min
 - c) Hourly Wage of Worker(s) Processing Responses : \$51/hour

- d) Cost to Process Each Response (*P: B multiplied by C*): \$21.42
- e) Total Cost to Process Responses (*P: A multiplied by D*):
\$14,844.06

2) Overall Labor Burden to the Federal Government

- a) Total Number of Annual Responses: 693
- b) Total Labor Burden (*P: add all "e's" in this section*): \$14,844.06

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: \$14,844
- 2) Total Operational and Maintenance Costs: \$0
- 3) Total Cost to the Federal Government (*P: Add 1 and 2 in this section*):
\$14,844

15. Reasons for Change in Burden

The burden has decreased since the previous approval due to over estimation of burden on previous submission.

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.