

SUPPORTING STATEMENT - PART A

National Defense University Security Office Forms – 0704-NDUS

1. Need for the Information Collection

The National Defense University (NDU) is an internationally recognized graduate-level university with five colleges and multiple centers of excellence focused on education, research, and outreach in national security matters. With campuses at Ft. McNair (Washington, DC), Norfolk, Virginia (VA) (the Joint Forces Staff College (JFSC)), and Ft. Bragg, North Carolina (NC), NDU is a worldwide entity with reach and influence extending throughout the U.S. and international community. To execute NDU's mission, a selection of individuals (military, civilians, contractors, and foreign partners) are assigned to the colleges and centers within NDU's area of responsibility to facilitate Joint Professional Military Education to U.S. military components, Department of Defense civilian force, and international community.

The NDU Security Office is responsible for ensuring personnel and facility security in all situations involving NDU employees. This includes ensuring that an appropriate background investigation is completed and favorably adjudicated in accordance with 32 CFR § 156.6 - Common access card (CAC) investigation and adjudication. The NDU Security Office is also responsible for in-processing all permanent personnel, including contractors, and foreign partners assigned to the colleges and centers within NDU's area of responsibility). In accordance with HSPD-12 and FIPS 201, data provided is necessary to process Personal Identity Verification (PIV) credentials to personnel seeking physical access to federally-controlled government facilities.

The authority by which to collect this information is 10 U.S.C. 2165, National Defense University; 10 U.S.C. 2163, Degree Granting Authority for National Defense University; and E.O. 9397, as amended (SSN).

2. Use of the Information

Respondents to this collection are National Defense University employees who must provide information to the NDU Security Office to facilitate essential personnel, facility, and information security functions. This includes information necessary to complete a background investigation for CAC card issuance (NDU Nomination for NACI Form) and information for in-processing and PIV credentialing (NDU Security In-Process Form). The Nomination for NACI and Security In-Process Forms are provided in pencil-and-paper format and submitted physically to the appropriate NDU Security Office personnel. The NDU Personnel Security team (PERSEC) then verifies that the inbound person has the correct security clearance and need to know for their intended role at NDU, and has the information required to process the individual for a CAC card and NDU badge, etc.

The NDU Nomination for NACI Form is needed to solicit information for the submission of a National Agency Check w/Inquiries (NACI) for NDU new hire employees and partners (interns, contractors, and foreign partners). The NACI is the minimum background investigation required to meet HSPD-12 requirements for CAC issuance to individuals' entrusted with access to Federal property, information systems, and any other information bearing on national security. The NDU Nomination for NACI Form is a transitory document that may be used as the basis for future investigation submission via the Electronic Questionnaires for Investigations Process (eQIP) application used by the Defense Counterintelligence and Security Agency (DCSA). Without the information collected on this form, NDU would be unable to initiate the NACI process to ensure Federal security, suitability, fitness, and credentialing of its new hire employees and partners.

The NDU Security In-Processing Form is needed to solicit information that will facilitate the processing of PIV credentials for personnel requiring physical access to NDU. The NDU Security In-Processing Form is a transitory document to solicit information on NDU new hire civilian employees and or contractors who have no prior government/DoD employment history. NDU Security In-Processing Form is utilized for vetting and verification of an employee's background investigation within Defense Information System for Security (DISS), DCSA Central Verification System (CVS), and Intelligence Community (IC) database Scattered Castles.

3. Use of Information Technology

Applicants currently submit the NDU Security In-Processing Form and the NDU Nomination for NACI Form in paper-and-pencil format to the appropriate NDU security personnel. It is included in this package. NDU Security endeavors to establish both these forms in electronic formats on NDU's SharePoint website in the future so that responses can be submitted and processed 100% 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

The standard for collection of data will be at the minimum amount necessary and appropriate. If information is not collected on an as-needed basis, NDU will not be able to initiate, process, and complete these essential functions in the timely manner that is necessary to ensure personnel, facility, and information security. It could also affect NDU employees' ability to conduct their essential duties.

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 Wednesday, December 16, 2020. The 60-Day FRN citation is 85 FR 81457.

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

A 30-Day Federal Register Notice for the collection published on Thursday, September 16, 2021. The 30-Day FRN citation is 86 FR 51657.

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

A Privacy Act Statement is required for this collection because we are requesting individuals to furnish personal information for a hard copy form system of records maintained by the security office. Privacy Act Statements are provided at the bottom of all three forms.

The SORN associated with this information collection (DNDU-01, "National Defense University Student Data Files") is currently under revision. A draft copy of the revised SORN has been provided with this package for OMB's review. The current SORN can be accessed at the follow link that is also provided in the Privacy Act Statement on all three forms: <https://dpcl.d.defense.gov/Privacy/SORNsIndex/DOD-wide-SORN-Article-View/Article/570570/dndu01/>

The approved Privacy Impact Assessment (PIA) associated with this collection, "National Defense University (NDU) Enterprise Information System (NEIS)" is provided with the package.

Records retention and disposition is covered by CJCSM 5760.01A, Vol. II, "Joint Staff and Combatant Command Disposition Schedule," dated 13 July 2012, incorporating Schedule DAA-0218-2019-0002, "Academic Affairs," dated 22 June 2020.

11. Sensitive Questions

Respondents' Social Security Numbers are collected on the NDU Nomination for NACI Form and the NDU Security In-Process Form. An SSN Justification Memo is included with the collection package.

No other questions considered sensitive are being asked in this collection.

12. Respondent Burden and its Labor Costs

Part A: ESTIMATION OF RESPONDENT BURDEN

1) Collection Instruments

NDU Nomination for NACI Form

- a) Number of Respondents: 100
- b) Number of Responses Per Respondent: 1
- c) Number of Total Annual Responses: 100
- d) Response Time: 10 minutes
- e) Respondent Burden Hours: 16.67 hours

NDU Security In-Process Form

- a) Number of Respondents: 125
- b) Number of Responses Per Respondent: 1
- c) Number of Total Annual Responses: 125
- d) Response Time: 13 minutes
- e) Respondent Burden Hours: 27.08 hours

2) Total Submission Burden (Summation or average based on collection)

- a) Total Number of Respondents: 225
- b) Total Number of Annual Responses: 225
- c) Total Respondent Burden Hours: 44 hours

Part B: LABOR COST OF RESPONDENT BURDEN

1) Collection Instruments

NDU Nomination for NACI Form

- a) Number of Total Annual Responses: 100
- b) Response Time: 10 minutes
- c) Respondent Hourly Wage: \$17.00
- d) Labor Burden per Response: \$2.83
- e) Total Labor Burden: \$283

NDU Security In-Process Form

- a) Number of Total Annual Responses: 125
- b) Response Time: 13 minutes
- c) Respondent Hourly Wage: \$17.00
- d) Labor Burden per Response: \$3.68
- e) Total Labor Burden: \$460

2) Overall Labor Burden

- a) Total Number of Annual Responses: 225
- b) Total Labor Burden: \$743

The most common respondents are NDU Interns. The Respondent hourly wage was determined by using the Office of Personnel Management GS pay-scale for GS-4, step 1 for the Washington, D.C. locality pay area.

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 Instruments

NDU Nomination for NACI Form

- a) Number of Total Annual Responses: 100
- b) Processing Time per Response: 10 minutes
- c) Hourly Wage of Worker(s) Processing Responses: \$36.96
- d) Cost to Process Each Response: \$6.16
- e) Total Cost to Process Responses: \$616

NDU Security In-Process Form

- a) Number of Total Annual Responses: 125
- b) Processing Time per Response: 15 minutes
- c) Hourly Wage of Worker(s) Processing Responses: \$40.63
- d) Cost to Process Each Response: \$10.16
- e) Total Cost to Process Responses: \$1,270

2) Overall Labor Burden to the Federal Government

- a) Total Number of Annual Responses: 225
- b) Total Labor Burden: \$1,886

Part B: OPERATIONAL AND MAINTENANCE COSTS

- 1) Cost Categories
 - a) Equipment: \$2,200
 - b) Printing: \$0
 - c) Postage: \$0
 - d) Software Purchases: \$62.83
 - e) Licensing Costs: \$0
 - f) Other: \$0

2) Total Operational and Maintenance Cost: \$2,263

Part C: TOTAL COST TO THE FEDERAL GOVERNMENT

- 1) Total Labor Cost to the Federal Government: \$1,886
- 2) Total Operational and Maintenance Costs: \$2,263
- 3) Total Cost to the Federal Government: \$4,149

15. Reasons for Change in Burden

This is an existing collection currently in use without an OMB Control Number.

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.