

SUPPORTING STATEMENT - PART A

Pentagon Facilities Access Control System – OMB Control Number 0704-AAFV

1. Need for the Information Collection

The Pentagon Force Protection Agency (PFPA) is responsible for protecting the Pentagon and related facilities under the jurisdiction, custody, and control of the Department of Defense (DoD), in accordance with DoD Regulation 5200.08-R, “Physical Security Program.” This authority is promulgated in-

- 10 USC 2674 “Operation and Control of Pentagon Reservation and Defense facilities in National Capital Region”
- DoD Directive (DoDD) 1000.25 “DoD Personnel Identity Protection (PIP) Program,”
- DoDD 8521.01E “DoD Biometrics”
- DoD Instruction 5200.08 “Security of DoD Installations and Resources and the DoD Physical Security Review Board (PSRB)”
- DoD 5200.08-R “Physical Security Program”
- DoD 5105.68 “Pentagon Force Protection Agency”
- OSD Administrative Instruction (AI) 30 “Force Protection on the Pentagon Reservation,”
- 32 CFR 234, “Conduct on the Pentagon Reservation, as amended”
- E.O. 9397 “SSN”, as amended

PFPA must positively establish the identity of all individuals, including contractors and visitors, seeking access to the Pentagon and Pentagon facilities. PFPA must also determine that a legitimate need for access exists and that individuals seeking access meet minimum suitability standards including passing a National Crime Information Center (NCIC) background check. Personal Identifiable Information (PII), required to conduct an NCIC check includes: full name, Social Security number, date and place of birth, and, if the visitor is not a U.S. Citizen, alien registration or passport number, expiration date, and country of origin.

2. Use of the Information

The information will be used by the Pentagon Pass Office to conduct an NCIC check of all members of the public 18 years and older that request access to the Pentagon or a Pentagon facility. The method for collecting the required information varies depending on the status of the individual making the request and the length of time that they require access.

- A. Privilege Management Program (PMP), DD Form 2249 “Pentagon Access Enrollment Form”
 - a. Personnel who require swipe access to the Pentagon or any of its leased facilities must enroll in the PMP. To enroll, personnel must submit a DD Form 2249 “Pentagon Access Enrollment Form” to gain access via a Personal Identity Verification (PIV) Card or Common Access Card (CAC). Once enrolled

into PMP, cardholders are granted access into the Physical Access Control System (PACS) for spaces they are approved to access by the responsible approving authority.

- b. For personnel who do not meet the criteria for a PIV card or a CAC, but require swipe access into the Pentagon or any of its leased facilities, a DD Form 2249 can also be used to request a Pentagon Facility Alternate Credential (PFAC).
- B. Visitor Management System (VMS) Registration Portal
- a. The VMS is a tentacle of the aforementioned PMP. Personnel who do not have swipe access into the Pentagon or its leased facilities are deemed visitors and must be registered by a sponsor. Sponsors initiate visits by submitting the visitor's name and email address at <https://visitorsponsor.pfpa.mil/>. The visitor will then receive a link via the email provided, allowing the visitor to navigate to the VMS Registration Portal and complete the application for adjudication. Once it is complete and PFPA reviews the submission, the visitor and sponsor will receive a system-generated email on the adjudication decision.
- C. Alternative Methods for Submission
- a. Visitors may provide the required information in the body of a properly protected email when technical limitations prevent them from accessing the Visitor Management System's Web Portal. Pentagon Pass Office personnel will enter this information in the Visitor Management Web Portal.

3. Use of Information Technology

The DD 2249 is filled out via paper and electronically, although about 90% of responses are submitted on paper and 10% submitted electronically. Once submitted, physical copies of the form are stored in the Credentialing Office at the Pentagon (safe and secure).

Currently, in order for the Credentialing Office to verify a cardholder is approved for PMP enrollment, the cardholder must bring a hardcopy of that form into the Credentialing Office. The operators do not have a centralized repository to look-up and verify if approval has been given. PFPA is deploying the Authorized Signer's Portal in September 2022 which is meant to alleviate this. The Authorized Signer's Portal will automatically process and store the individual's data on the DD 2249 electronically into the Privilege Management Program (PMP), which the operator will be able to verify electronically without a hardcopy.

The information on the VMS Registration Portal is collected using 100% electronic methods. The Information submitted through the Visitor Management Web Portal is not stored in the portal. It is immediately transmitted to a database for processing by the Pentagon Pass Office personnel. Submitted information is encrypted when transmitted and while being stored in the database. Information is automatically deleted from the database when it is no longer needed in accordance with DoD data retention policies.

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

Conducting these collections less frequently would keep PFPA from properly vetting visitors and contractors who seek access to the Pentagon or Pentagon Facilities.

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 for the collection published on Monday, March 28, 2022. The 60-Day FRN citation is 87 FR 17278.

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

A 30-Day Federal Register Notice for the collection published on Thursday, August 4, 2022. The 30-Day FRN citation is 87 FR 47730.

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

Both collection instruments require a Privacy Act Statement (PAS). For the DD 2249, the PAS is located at the top of the second page, which respondents can read directly from the form or can be provided the PAS from whomever fills out the form on their behalf. For the VMS Registration Portal, the PAS appears before respondents can answer any questions.

A draft copy of the SORN DPFPA 01, "Pentagon Facilities Access Control System" has been provided with this package for OMB's review.

A Privacy Impact Assessment (PIA) is not required for the DD 2249 because PII is not being collected electronically.

The VMS Registration Portal does require a PIA, "Privilege Management Program-2," which has been provided with this package for OMB's review.

The retention and disposal for these records are "Temporary: Cutoff record on return, deactivation or confiscation of card. Destroy/delete data 5 years old after cutoff."

11. Sensitive Questions

The data collected includes information relevant to the individuals requesting access to a DoD facility where the PFFA is responsible for providing security services. The SSN is collected from the individual to verify the individual's identity. The SSN Justification Memo is included as part of this package.

12. Respondent Burden and its Labor Costs

Part A: ESTIMATION OF RESPONDENT BURDEN

- 1) DD Form 2249
 - a) Number of Respondents: 47,200
 - b) Number of Responses Per Respondent: 1
 - c) Number of Total Annual Responses: 47,200
 - d) Response Time: 10 minutes
 - e) Respondent Burden Hours: 7,866.67 hours

- 2) PFFA Visitor Management System – Registration Portal
 - a) Number of Respondents: 211,000
 - b) Number of Responses Per Respondent: 1
 - c) Number of Total Annual Responses: 211,000
 - d) Response Time: 7 minutes
 - e) Respondent Burden Hours: 24,616.67 hours

- 3) Total Submission Burden
 - a) Total Number of Respondents: 258,200
 - b) Total Number of Annual Responses: 258,200
 - c) Total Respondent Burden Hours: 32,483.34

Part B: LABOR COST OF RESPONDENT BURDEN

- 1) DD Form 2249
 - a) Number of Total Annual Responses: 47,200
 - b) Response Time: 10 Minutes
 - c) Respondent Hourly Wage: \$25.72
 - d) Labor Burden per Response: \$4.29
 - e) Total Labor Burden: \$202,330.67
- 2) PFFPA Visitor Management System – Registration Portal
 - a) Number of Total Annual Responses: 211,000
 - b) Response Time: 7 Minutes
 - c) Respondent Hourly Wage: \$25.72
 - d) Labor Burden per Response: \$3
 - e) Total Labor Burden: \$633,140.67
- 3) Overall Labor Burden
 - a) Total Number of Annual Responses: 258,200
 - b) Total Labor Burden: \$835,471.34

The Respondent hourly wage was determined by using the Department of Labor Wage Website (<https://www.dol.gov/general/topic/wages>).

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) DD Form 2249
 - a) Number of Total Annual Responses: 47,200
 - b) Processing Time per Response: 10 minutes
 - c) Hourly Wage of Worker(s) Processing Responses: \$19.08
 - d) Cost to Process Each Response: \$3.18
 - e) Total Cost to Process Responses: \$150,096

- 2) PFPA Visitor Management System – Registration Portal
 - a) Number of Total Annual Responses: 211,000
 - b) Processing Time per Response: 3 minutes
 - c) Hourly Wage of Worker(s) Processing Responses: \$19.08
 - d) Cost to Process Each Response: \$0.95
 - e) Total Cost to Process Responses: \$201,294

- 3) Overall Labor Burden to the Federal Government
 - a) Total Number of Annual Responses: 258,200
 - b) Total Labor Burden: \$351,390

Part B: OPERATIONAL AND MAINTENANCE COSTS

- 1) Cost Categories
 - a) Equipment: \$0.00
 - b) Printing: \$0.00
 - c) Postage: \$0.00
 - d) Software Purchases: \$0.00
 - e) Licensing Costs: \$0.00
 - f) Other: \$3,200,000.00 yearly cost for maintenance and support of the Identity, Credential, and Access Management (ICAM) program for PMP.

- 2) Total Operational and Maintenance Cost: \$3,200,000

Part C: TOTAL COST TO THE FEDERAL GOVERNMENT

- 1) Total Labor Cost to the Federal Government: 351,390

- 2) Total Operational and Maintenance Costs: \$3,200,000

- 3) Total Cost to the Federal Government: 3,551,390

15. Reasons for Change in Burden

This is a collection 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.