<u>SUPPORTING STATEMENT - PART A</u>

Personnel Security System Access Request Form – 0704-0542

Summary of Changes from Previously Approved Collection

- Title changed to reflect that this ICR now only consists of one form.
- Removal of DD Form 2962 Vol. 1
- Changed DD Form 2962 Vol. 2 Classification from FOUO to CUI when filled in
- Updated DD Form 2962 Vol. 2 System names to current systems
- The burden has increased to reflect a normal increase in the average hourly wages of both respondents and workers processing responses

1. Need for the Information Collection

50 U.S.C. 401, Congressional declaration of purpose; 50 U.S.C. 435, Purposes; DoD 5200.2R, Department of Defense Personnel Security Program Regulation; DoD 5105.21-M-1, Sensitive Compartment Information Administrative Security Manual; E.O. 10450, Security Requirements for Government Employment; E.O. 10865, Safeguarding Classified Information Within Industry; E.O. 12333, United States Intelligence Activities; E.O. 12829, National Industrial Security Program; and E.O. 12968, Access to Classified Information.

Personnel systems across the DoD, including National Background Investigation Services (NBIS), the Defense Information System for Security (DISS), the Defense Central Index of Investigations (DCII), the Secure Web Fingerprint Transmission (SWFT) require personal data collection to facilitate the initiation, investigation and adjudication of information relevant to DoD security clearances and employment suitability determinations for active duty military, civilian employees and contractors seeking such credentials. These Personnel Security Systems are the authoritative source for clearance information resulting in accesses determinations to sensitive/classified information and facilities. The DD 2962, Personnel Security System Access Request (PSSAR) Form is used to collect the necessary information to vet and establish accounts for persons wishing to become users and gain access to these systems.

2. Use of the Information

The collection instrument, the DD Form 2962, Vol. 2 (PSSAR Form), is solely used for the purpose of requesting an account for NBIS, DISS, DCII, or SWFT, and this information collection request is not intended to cover any information collected within those systems. The PSSAR form's targeted respondents are Facility Security Officers (FSOs) who work in industry companies and not in the DoD. These FSOs require access for the purpose of facilitating the initiation, investigation and adjudication of information relevant to DoD security clearances and employment suitability determinations for contractors seeking such credentials. Each respondent is required to have a completed PSSAR on file at all times to remain compliant with the account request procedures for all of these systems.

The PSSAR Form is published and available on the DoD Forms website located at http://www.esd.whs.mil/Directives/forms/. However, respondents generally retrieve this form at the DCSA resource website (https://www.dcsa.mil/is/diss/dissresources/) which hosts announcements, policy documentation, and relevant links to NBIS, DISS, DCII, and SWFT. A respondent will retrieve this form from the links above, complete it with their personal information, desired system access and relevant training requirements. Upon their signature, the form is signed by their nominating official and validating official to show both the need for access and the proper clearance level. Upon the completion of the form, it is passed encrypted either through DoD PKI ECA ID or DoD SAFE or other industry coordinated method to the government through DCSA Customer Engagement Team Helpdesk who validate the completion of the form and in turn create the accounts in the respective systems. The completed PSSAR Form must be retained as it may be requested later during audits or compliance checks.

3. <u>Use of Information Technology</u>

100% of respondents may complete and submit the PSSAR Forms electronically.

4. <u>Non-duplication</u>

The information obtained through this collection is unique and is not already available for use or adaptation from another cleared source.

5. <u>Burden on Small Businesses</u>

This information collection does not impose a significant economic impact on a substantial number of small businesses or entities.

6. <u>Less Frequent Collection</u>

This information collection is conducted as required to access the personnel systems which the Facility Security Officers use to maintain records. If collection were stopped, ability to make suitability determinations for employment and access to classified information would be infeasible for active duty military, civilian employees and contractors.

7. <u>Paperwork Reduction Act Guidelines</u>

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. <u>Consultation and Public Comments</u>

Part A: PUBLIC NOTICE

A 60-Day Federal Register Notice (FRN) for the collection published on Wednesday, August 25, 2021. The 60-Day FRN citation is 86 FR 47480.

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

A 30-Day Federal Register Notice for the collection published on Thursday, December 30, 2021. The 30-Day FRN citation is 86 FRN 74407.

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. <u>Confidentiality</u>

A Privacy Act Statement is displayed to respondents on the DD Form 2962 Vol. 2

A copy of the SORN associated with the DD Form 2962 (DUSDI 02-DoD, "Personnel Vetting Records System") has been provided with this package for OMB's review.

A Privacy Impact Assessment (PIA) is not required for this per coordination with the DCSA Privacy Office.

Records are destroyed no later than 16 years after termination of affiliation with the DoD. Investigative files and the computerized data bases which show the scheduling or completion of an investigation are retained for 16 years from the date of closing or the date of the most recent investigative activity, whichever is later, except for investigations involving potentially actionable issue(s) which will be maintained for 25 years from the date of closing or the date of the most recent investigative activity.

11. Sensitive Questions

A Social Security Number Justification Memo has previously been submitted and approved on 25 October 2019.

12. Respondent Burden and its Labor Costs

Part A: ESTIMATION OF RESPONDENT BURDEN

1) Collection Instrument(s)

[PSSAR Form]

a) Number of Respondents: 22,225

b) Number of Responses Per Respondent: 1

c) Number of Total Annual Responses: 22,225

d) Response Time: **10 minutes**

e) Respondent Burden Hours: 3,704.2 hours

- 2) Total Submission Burden (Summation or average based on collection)
 - a) Total Number of Respondents: 22,225

- b) Total Number of Annual Responses: 22,225
- c) Total Respondent Burden Hours: 3,704.2 hours

Part B: LABOR COST OF RESPONDENT BURDEN

1) Collection Instrument(s)

[PSSAR Form]

- a) Number of Total Annual Responses: 22,225
- b) Response Time: 10 minutes
- c) Respondent Hourly Wage: \$36.35
- d) Labor Burden per Response: \$6.06
- e) Total Labor Burden: \$134,646.46
- 2) Overall Labor Burden
 - a) Total Number of Annual Responses: 22,225
 - b) Total Labor Burden: \$134,646

The Respondent hourly wage was determined by using information from https://www.bls.gov/oes/current/oes131041.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)

[PSSAR Form]

- a) Number of Total Annual Responses: 22,225
- b) Processing Time per Response: 10 minutes
- c) Hourly Wage of Worker(s) Processing Responses: \$33.12
- d) Cost to Process Each Response: \$5.63
- e) Total Cost to Process Responses: \$125,135.64

Processing time includes validating form for completeness, accuracy, validity and setting up system account as necessary.

Hourly rate estimate is taken from the GS09 (step 1) salary per the adjusted 2021 OPM rates: https://www.opm.gov/policy-data-oversight/pay-leave/salaries-wages/salary-tables/pdf/2021/GS h.pdf

2) Overall Labor Burden to the Federal Government

a) Total Number of Annual Responses: 22,225

b) Total Labor Burden: \$125,135.64

Part B: OPERATIONAL AND MAINTENANCE COSTS

1) Cost Categories

a) Equipment: \$0b) Printing: \$0c) Postage: \$0

d) Software Purchases: \$0e) 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: \$125,135.64

2) Total Operational and Maintenance Costs: \$0

3) Total Cost to the Federal Government: \$125,135.64

15. Reasons for Change in Burden

The respondent burden has increased due to a regular increase in the estimated hourly wage of respondents.

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. <u>Exceptions to "Certification for Paperwork Reduction Submissions"</u>

We are not requesting any exemptions to the provisions stated in 5 CFR 1320.9