

SUPPORTING STATEMENT - PART A

Synchronized Pre-deployment and Operational Tracker Enterprise Suite (SPOT-ES)

OMB Control Number 0704-0460

Summary of Changes from Previously Approved Collection

- The respondent burden has decreased since the previous approval due to the withdrawal of troops and support contractors from Afghanistan.
- While the total number of annual responses has decreased, both time and labor costs have increased for the portion of data prepared by the federal government.

1. Need for the Information Collection

The National Defense Authorization Act (NDAA) for Fiscal Year (FY) 2008, Public Law 110-181, Section 861, requires a common database between the Department of State (DoS), Department of Defense (DoD), and the United States Agency for International Development (USAID) to serve as the repository of information on contracts and contractor personnel performing in Iraq and Afghanistan. A 2010 Memorandum of Understanding between DoS, DoD and USAID designates the Synchronized Pre-deployment and Operational Tracker (SPOT) as that common database. Public Law 110-181, Section 862, requires a process for registering, processing, accounting for, and keeping appropriate records of personnel performing private security functions in an area of combat operations. Again, SPOT was selected as the common database for compliance. DoD Instruction 3020.41, Operational Contractor Support (OCS), states: "In applicable contingency operations, contractor visibility and accountability shall be maintained through a common joint database, the Synchronized Pre-deployment and Operational Tracker (SPOT)."

DoDI 3020.41 further requires SPOT to assist Combatant Commanders (CCDR) in maintaining awareness of the nature, extent, and potential risks and capabilities associated with OCS in support of contingency, humanitarian or peacekeeping operations, or military exercises as designated by the CCDR. DoDI 3020.41 also outlines procedures for establishing, maintaining, and validating the SPOT common joint database to ensure accountability, visibility, force protection, medical support, personnel recovery, and other related support can be accurately forecasted and provided to deployed contractors as required.

Government contract companies are required to enter their employee's data into SPOT before contractors are deployed outside of the United States. SPOT is also used during Homeland Defense and Defense Support of Civil Authority Operations within the United States. This data collection on contractors is a condition of DoD contracts when Defense Federal Acquisition Regulation Supplement (DFARS) 252.225-7040, Contractor Personnel Authorized to Accompany U.S. Armed Forces Deployed Outside the United States, is

incorporated. Any persons who choose not to have data collected will not be entitled to employment opportunities that require this data to be collected.

The January 2008 memo from the Director, Defense Procurement and Acquisition Policy, requires all Department of Defense contractors employed on DoD-funded contracts being performed in support of contingency operations anywhere in the world be entered into SPOT by 30 September 2008 and continuing thereafter. This extends the requirement for SPOT beyond the initial 2008 NDAA which only required SPOT for Iraq and Afghanistan.

In their 2004 Memo, the Assistant Secretary of the Army for Acquisition, Logistics and Technology (ASA(ALT)) directed that all military, Department of Defense (DoD) civilians and government contractors be centrally managed in SPOT to provide a single source for visibility of all their deployed personnel assets (military, DoD civilians and contractors). Thus, the SPOT Enterprise Suite collects information on all three categories when they scan through any Joint Asset Movement Management System (JAMMS) workstation.

Contractor personnel are required to have a Letter of Authorization (LOA) in their possession at all times when deployed; SPOT is the only system that provides the LOA. The LOA is required to process through a deployment center and to travel to, from, or within designated operational areas. The LOA is required for access to authorized Government Services (AGS) which are assigned by the responsible Contracting Officer for each individual contractor IAW their contract as a part of the automated LOA process in SPOT. If the data is not collected to generate the LOA, contractors would not be able to obtain AGS in their deployed locations, including access to meals and lodging - limiting their ability to obtain critical life support.

2. Use of the Information

In accordance with appropriate law, acquisition policy, and regulations, DoD, DoS and USAID companies, with funded contracts supporting contingency operations worldwide, input employee data and maintain by-name accountability of contractor personnel in a designated database as specified in their contract. Currently, SPOT is the named authoritative database for deployed contractor information. Contractors are responsible for populating their employee's in theater arrival date, knowing the general location of their employees, and updating the SPOT database to reflect current status of personnel deployed in support of contingency, humanitarian, peacekeeping or disaster relief operations or as designated by the cognizant Combatant Commander. Prime contractors are also responsible for ensuring that the database, SPOT contains up-to-date, real-time information regarding their subcontractors at all tiers.

The collection begins with the announcement of a named contingency, humanitarian, peacekeeping or disaster relief operation or when designated by the Combatant Commander. Companies with contracts to provide support respond by documenting their employees who will deploy to the geographical area of responsibility (AOR) being impacted using their internal databases or company forms. The required data elements are then

entered into the SPOT database manually, or uploaded into SPOT using a bulk import. The SPOT URL is <https://spot.dmdc.mil> (screenshots included under supplemental documents of this information collection request).

Once deployed, contractors are required to scan their LOA at JAMMS workstations. JAMMS records the date and time that the specific individual is at a certain location consuming associated government services, e.g., meals, flights, or billeting. The JAMMS scans are uploaded daily into the unclassified SPOT system.

3. Use of Information Technology

SPOT-ES is an entirely web-based system and 100% of the information gathered is collected 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. SPOT is the single authoritative database with respect to deployed U.S. contractors.

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 data is collected one-time for each deploying contractor for their initial deployment and updated for each subsequent deployment. As the situation regarding their deployment changes, the record is updated until the individual re-deploys, i.e., leaves the area of operations. All information is collected electronically to reduce the burden of maintaining paper copies in accordance with Public Law 96-511, Section 94 Statute 2812. If this data is not collected and updated there is a risk that contractor personnel will be without the ability to obtain life support or personnel recovery services when placed in harm's way.

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, March 30, 2022. The 60-Day FRN citation is 87 FR 18360 FRN 18360.

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

A 30-Day Federal Register Notice for the collection published on Tuesday, August 2, 2022. The 30-Day FRN citation is 87 FR 47198 FRN 47198.

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 not needed because the system does not collect information from the individual.

The Systems of Records Notice for this collection may be found online at the following link: <https://dpcl.dod.mil/Privacy/SORNsIndex/DOD-wide-SORN-Article-View/Article/570569/dmdc-18-dod/>.

The Privacy Impact Assessment for the Synchronized Pre-deployment and Operational Tracker Enterprise Suite (SPOT-ES) is published online at the following link: <https://www.dmdc.osd.mil/appj/dwp/documents.jsp> and enter SPOT in search window or use this link: <https://dwp.dmdc.osd.mil/dwp/app/search-results?search=spot>.

Records and Disposition Schedule:

Records are maintained permanently. All files are closed upon end of individual's deployment. They are transferred to the National Archives and Records Administration when 25 years old.

11. Sensitive Questions

Social Security Numbers are collected as part of the individual contractor records. A Social Security Number Justification Memo is included as part of the OMB submission package.

12. Respondent Burden and its Labor Costs

Part A: ESTIMATION OF RESPONDENT BURDEN

1) SPOT-ES:

- a) Number of Respondents: 1062

- b) Number of Responses Per Respondent: 58
- c) Number of Total Annual Responses: 61,596
- d) Response Time: 30 minutes
- e) Respondent Burden Hours: 30,798 hours

2) Total Submission Burden

- a) Total Number of Respondents: 1,062
- b) Total Number of Annual Responses: 61,596
- c) Total Respondent Burden Hours: 30,798 hours

Part B: LABOR COST OF RESPONDENT BURDEN

1) SPOT-ES:

- a) Number of Total Annual Responses: 61,596
- b) Response Time: 30 minutes
- c) Respondent Hourly Wage: \$37.97
- d) Labor Burden per Response: \$18.99
- e) Total Labor Burden: \$1,169,708.04

2) Overall Labor Burden

- a) Total Number of Annual Responses: 61,596
- b) Total Labor Burden: \$1,169,708.04

The Respondent hourly wage was derived from the average annual salary for Human Resources Specialists.

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) SPOT-ES:

- a) Number of Total Annual Responses: 61,596
- b) Processing Time per Response: 3 minutes
- c) Hourly Wage of Worker(s) Processing Responses: \$37.15
- d) Cost to Process Each Response: \$1.86
- e) Total Cost to Process Responses: \$114,568.56

2) Overall Labor Burden to the Federal Government

- a) Total Number of Annual Responses: 61,596
- b) Total Labor Burden: \$114,568.56

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: \$7,485,431.44

Part C: TOTAL COST TO THE FEDERAL GOVERNMENT

- 1) Total Labor Cost to the Federal Government: \$114,568.56
- 2) Total Operational and Maintenance Costs: \$7,485,431.44
- 3) Total Cost to the Federal Government: \$7,600,00.00

15. Reasons for Change in Burden

The respondent burden has decreased since the previous approval due to the withdraw of all troops and contractors from Afghanistan in late 2021. As a result, the number of required responses was reduced from 75,000 to 61,000. The time required for respondents to complete their portion of work in SPOT for each deployment has remained the same, 30 minutes. Hourly wages were increased, raising the labor burden per response; however, the total hours and labor burden were reduced due to the lower number of responses being collected. The previous federal burden calculation considered only the machine processing time without consideration of the government personnel labor. Therefore, the revised federal government burden increase is due to a reassessment of the required processing time to include both the government authority and contracting officer roles – a total of 3 minutes per response.

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.