

SUPPORTING STATEMENT
Financial Disclosure Report - Standard Form 714
OMB Control No. 3095-0058

1. Circumstances Making the Collection of Information Necessary

Executive Order (E.O.) 12968, Section 1.3 requires that employees who have regular access to classified information, as specified in Section 1.3(a), submit, as a condition of maintaining access to such information, relevant information concerning their financial condition.

The ODNI is responsible for the management and continuation in existence of Standard Form 714: Financial Disclosure Report, in accordance with the responsibilities assigned to the Director of National Intelligence (DNI) as Security Executive Agent for all departments and agencies of the U.S. Government pursuant to Section 803 of the National Security Act of 1947, E.O. 13467, and E.O. 12968.

2. Purpose and Use of the Information. The Financial Disclosure Report collects information that is used to make determinations about individuals' access to classified information as specified in Section 1.3(a) of E.O. 12968. The information will be used to help make personnel security determinations, including whether to grant a security clearance; to allow access to classified information, sensitive areas, and equipment; or to permit assignment to sensitive national security positions. The data may later be used as part of a review process to evaluate continued eligibility for access to classified information or as evidence in legal proceedings.

3. Use of Information Technology and Burden Reduction. Consistent with the requirements of the Government Paperwork Elimination Act (Pub. L. No. 105-277), the DNI, as Security Executive Agent directs the heads of departments and agencies wherever practicable to provide filers the means to complete and submit the information collection electronically. Departments and agencies retain the information electronically as well. The Department of Defense and the Intelligence Community have developed a software analysis tool for the information provided in the Standard Form 714, Financial Disclosure Report. This information technology tool assists counterintelligence professionals in assessing subjects' financial responsibility for purposes of determining eligibility for access to classified information as specified in Section 1.3(a) of E.O. 12968.

4. Efforts to Identify Duplication and Use of Similar Information. There is no duplication. The required data is collected and retained by the department or agency sponsoring the individual's access to classified information.

5. Impact on Small Businesses or Other Small Entities. The information requirements do not have a significant impact on small businesses or other small entities.

6. Consequences of Collecting the Information Less Frequently. The frequency of response is annual as specified in E.O. 12968.

7. Special Circumstances Relating to the Guidelines of 5 CFR 1320.5. The collection of information is consistent with the regulations in 5 CFR 1320.5.

8. Comments in Response to the Federal Register Notice and Efforts to Consult Outside Agency.

A Federal Register Notice was published on November 30, 2021 (FRN 2021-26120). No public comments were received during the 60 day posting. However, comments were received from the ODNI internal review that, while non-substantive to the contents of the form or instructions, led to minor corrections in the Privacy Act Statement. The FRN requested an extension in effect of SF 714, no substantive changes were proposed to the Form or its instruction. Therefore, no efforts were made to formally consult outside Agencies.

9. Explanation of Any Payment or Gift to Respondents. This information collection involves no remuneration to respondents.

10. Assurance of Confidentiality Provided to Respondents. Participating Government agencies retain and protect the Financial Disclosure Report pursuant to the Privacy Act, 5 U.S.C. 552a. The form and its contents become releasable only in accordance with Privacy Act provisions and other applicable laws. This information is released only to authorized personnel having a need to know for official purposes. The completed form is stored in a secure manner, and when no longer needed (consistent with an applicable NARA retention schedule), it will be disposed of through secure destruction.

11. Justification for Sensitive Questions. E.O. 12968 requires collection of sensitive personal financial information in order to determine subjects' eligibility for access to classified information.

12. Estimates of Hour Burden Including Annualized Hourly Costs. The hour burden for individual respondents who submit a paper SF 714 or an electronic inquiry is estimated as follows:

<i>Form of Request From Respondents</i>	<i>Number of Respondents</i>	<i>Responses per Respondent</i>	<i>Minutes per Response</i>	<i>Annual Hour Burden</i>
Standard Form 714	86,000	1	120	172,000

The estimated number of respondents and time for the completion of the form is based on a data received from the primary agencies impacted by this form. The respondents represent contractors with security clearances.

13. Estimate of Other Total Annual Cost Burden to Respondents or Recordkeepers. The initial estimated cost for completing the SF 714 is \$8,144,200 based on the assumption that it takes a respondent, paid an hourly wage of \$47.35¹, two-hours (\$94.70) to complete the form for the first time. Subsequent annual updates should significantly reduce the cost burden. The number of respondents is based on a prior survey of primary agencies that identified potential respondents.

<i>Form of Request From Respondents</i>	<i>Number of Respondents</i>	<i>Minutes per Response</i>	<i>Respondent Cost</i>	<i>Annualized Cost For Hour Burden</i>
Standard Form 714	86,000	120	\$94.70	\$8,144,200

¹ Hourly wage is estimated using the GS 12, Step 5 pay grade with Washington D.C. locality pay.

14. **Annualized Cost to the Federal Government.** The estimated annual cost for reviewing, processing and record keeping of a single SF-714 by the Federal Government is **\$9,187,380**; based on the assumption that it costs a Federal Agency approximately **\$106.83** for each SF-714 processed, then multiplied by 86,000 respondents. There is no cost assigned to the ODNI's responsibility as owner of the form. There is no cost (line item) specifically attributable to ODNI staff time required for review and administration of the form for the purpose intended. Note: ODNI employees who are respondents to the SF-714 have their forms collected, processed and stored by a separate IC sponsoring agency. The ODNI does not review, process or store SF-714s for its own ODNI employees.
15. **Explanation for Program Changes or Adjustments.** There is no change in burden.
16. **Plans for Tabulation and Publication and Project Time Schedule.** The information collection is not used for statistical studies or publications.
17. **Reason(s) Display of OMB Expiration Date is Inappropriate.** None. ODNI will display the expiration date.
18. **Exceptions to Certification for Paperwork Reduction Act Submissions.** ODNI is not requesting any exceptions to the certification statement identified in Item 19, Certification for Paperwork Reduction Submissions, of OMB Form 83-I.