

SUPPORTING STATEMENT - PART A

Investigative Interview Survey – 0705-0004

Summary of Changes from Previously Approved Collection

- On September 30, 2019 as authorized by Executive Order 13869, “Transferring Responsibility for Background Investigations to the Department of Defense,” the missions, records, and personnel of the Office of Personnel Management (OPM), National Background Investigations Bureau (NBIB), transferred to the Defense Counterintelligence and Security Agency (DCSA). The legacy Interview Survey Form (INV 10) was included in this transfer.
- Decrease in burden reflects the number of individuals returning the survey to DCSA.
- Title changed to clarify purpose and format of the collection

1. Need for the Information Collection

The Investigative Interview Survey is authorized by Section 925 of Public Law 115-91; Executive Order 13467, as amended by Executive Order 13869; DoD Directive 5105.42. The information collected on the survey is used to evaluate the investigative procedure exhibited by the investigator, the investigator’s professionalism, and the information discussed and reported by Federal or Federal contract investigator. Completion of the survey is voluntary.

The Investigative Interview Survey is sent to sources interviewed during a background investigation to solicit feedback regarding not only the content of the interview, but the interview process itself. Responses to these surveys are needed to support three main outcomes:

- Confirm the quality of the investigations through receipt of positive feedback
- Identification of investigators who may need additional training
- Identification of integrity issues, such as misconduct and potential falsification, for referral to Office of Inspector General (OIG) Integrity Assurance (IA) division for review and necessary action

2. Use of the Information

The Investigative Interview Survey is mailed by the Defense Counterintelligence and Security Agency (DCSA), to a random sampling of record and personal sources who were contacted during the background investigation process by investigators performing fieldwork. The survey is used as a quality control instrument designed to ensure the accuracy and integrity of the investigative product. The survey queries the recipient about the investigative procedure exhibited by the investigator, the investigator’s professionalism, and the information discussed and reported. Respondents return their completed survey using a prepaid business reply envelope.

Results from the survey are disseminated internally within the agency. In addition to the preformatted response options, DCSA invites the recipients to respond with any other relevant comments or suggestions. The information is used to evaluate federal and contractor investigator performance and identify areas where additional training may be needed. Data provided is analyzed to ensure proper investigative techniques and methods were followed, which supports the overall quality of the investigative record compiled for the subject of investigation and provides an additional layer of quality assurance for the background investigation process. Without this form, there would be a rise in cost for the manual conduct of these quality checks with limited personnel resources.

The information collected is also used by OIG as part of their investigations on background investigators, assisting in identification of alleged falsification amongst investigator staff. Where potential misconduct exists, DCSA OIG can mail additional surveys to a sampling of personal sources reported by an investigator accused of potential misconduct.

As part of this request, DCSA proposes minor changes to several questions on the INV10. All changes are merely intended to enhance the clarity of the questions being asked and do not change the actual information being solicited.

3. Use of Information Technology

Once completed, forms are returned to DCSA and data is entered into an IT data base. The forms are subject to the Government Paperwork Elimination Act (GPEA). However, they are not posted on DCSA's website because the forms contain individually pre-printed information. Therefore, it is not practical, due to privacy considerations, to access the forms through the DCSA public website.

The collection of information does not involve automated, electronic, mechanical or other technical collection techniques. The survey must be signed by the respondent, to certify that all information provided is true, correct, complete, and made in good faith.

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

DCSA's ability to perform quality and integrity checks on Investigative processes would be severely compromised without the use of the Investigative Interview Survey on a rolling basis. Batches are sent out on a monthly basis after work is transmitted by investigators, but respondents may return their survey at any time. Waiting a longer period of time to conduct the INV-10 follow up to respondents increases the chance of the respondent not recalling the interview clearly and impacting the quality of responses received.

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 Friday, April 29, 2022. The 60-Day FRN citation is 87 FR 25472.

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

A 30-Day Federal Register Notice for the collection published on Monday, August 22, 2022. The 30-Day FRN citation is 87 FR 51390.

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

The INV-10 Survey includes a Privacy Act Statement at the bottom of each form.

The applicable SORN is DSS/DCSA V2-01 "Inspector General Complaints"; <https://dpcl.d.defense.gov/Privacy/SORNsIndex/DOD-wide-SORN-Article-View/Article/570279/v2-01/>.

The applicable PIA is currently in a draft state as revisions are currently being made and vetted for signature within DCSA. A draft copy of the PIA, DCSA Enterprise Service Delivery (ESD), has been provided with this package for OMB's review.

Records are temporary and are destroyed two years after final action. Paper records are destroyed by shredding or burning. Electronic records are erased or overwritten.

11. Sensitive Questions

No questions considered sensitive are being asked in this collection.

12. Respondent Burden and its Labor Costs

Part A: ESTIMATION OF RESPONDENT BURDEN

- 1) Collection Instrument(s)
Investigative Interview Survey
 - a) Number of Respondents: 56,484
 - b) Number of Responses Per Respondent: 1
 - c) Number of Total Annual Responses: 56,484
 - d) Response Time: 6 minutes
 - e) Respondent Burden Hours: 5,648.4 hours

- 2) Total Submission Burden
 - a) Total Number of Respondents: 56,484
 - b) Total Number of Annual Responses: 56,484
 - c) Total Respondent Burden Hours: 5,648 hours

Part B: LABOR COST OF RESPONDENT BURDEN

- 1) Collection Instrument(s)
Investigative Interview Survey
 - a) Number of Total Annual Responses: 56,484
 - b) Response Time: 6 minutes
 - c) Respondent Hourly Wage: \$10.80
 - d) Labor Burden per Response: \$1.08
 - e) Total Labor Burden: \$61,002.72

- 2) Overall Labor Burden
 - a) Total Number of Annual Responses: 56,484
 - b) Total Labor Burden: \$61,003

Hourly wage for respondent is based on Executive Order (EO) 13658. Approximate Service Contract Act hourly minimum wage of \$10.80.

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)
Investigative Interview Survey
 - a) Number of Total Annual Responses: 56,484
 - b) Processing Time per Response: .1 hours
 - c) Hourly Wage of Worker(s) Processing Responses: \$28.39
 - d) Cost to Process Each Response: \$2.84

- e) Total Cost to Process Responses: \$160,358.08
- 2) Overall Labor Burden to the Federal Government
 - a) Total Number of Annual Responses: 56,484
 - b) Total Labor Burden: \$160,358.08

Part B: OPERATIONAL AND MAINTENANCE COSTS

- 1) Cost Categories
 - a) Equipment: \$0
 - b) Printing: \$4,518.72 (\$.08/voucher)
 - c) Postage: \$69,475.32 (\$1.23/voucher)
 - d) Software Purchases: \$0
 - e) Licensing Costs: \$0
 - f) Other: \$0
- 2) Total Operational and Maintenance Cost: \$73,994.04

Part C: TOTAL COST TO THE FEDERAL GOVERNMENT

- 1) Total Labor Cost to the Federal Government: \$160,358.08
- 2) Total Operational and Maintenance Costs: \$73,994.04
- 3) Total Cost to the Federal Government: \$234,352

15. Reasons for Change in Burden

The respondent burden has decreased since the previous approval due to a lower number of individuals being requested to complete the survey.

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.