<u>SUPPORTING STATEMENT – PART A</u>

Joint Contingency and Expeditionary Services (JCXS) – 0704-0589

1. Need for the Information Collection

As per RS HQ Vendor Vetting FRAGO 215-2015 Vendor Vetting Process and USFOR-A FRAGO 14-165 (MOD 2) Directs Sub Units to Adhere to Vendor Vetting Process, all companies/vendors operating within CENTCOM are to be registered in the Joint Contingency Contracting System (JCCS).

Para 3 (2) (a) of RS HQ Vendor Vetting FRAGO 215-2015 Vendor Vetting Process states "registering in JCCS means the vendor/contractor and all sub-contractors have created a profile in JCCS, provided all required information and submitted all required documents. Contracting Officers must ensure all vendors have a sufficient JCCS registration prior to submitting a vetting request"

In accordance with the RS HQ Vendor Vetting FRAGO 215-2015 Vendor Vetting Process and USFOR-A FRAGO 14-165 (MOD 2) and other appropriate policy and regulations, the information collection requirement is necessary to evaluate vendors for possible approval and acceptance to conduct business, access to U.S military installations, and adherence to US regulatory mandates. The Joint Contingency and Expeditionary Services (JCXS) family of systems is the DoD's agile, responsive, and global provider of Joint expeditionary acquisition business solutions that fulfill mission-critical requirements while supporting interagency collaboration – to include, but not limited to, contracting, exception to policy arming of contractors, financial support, spending analysis, contract close-outs, staffing, strategic sourcing, and reporting.

The Joint Contingency Contracting System (JCCS) is a web-based service that sits on the JCXS platform, designed to, and currently used to register foreign vendors for Installation Access Eligibility. These vendors must provide company and banking information as well as appropriate identification documents in order to have the opportunity to conduct such business. If the vendor does not provide the requested information, then proper verification of credentials and a security review cannot be completed properly. It is of national security interest for the US to maintain force protection for our US forces and coalition partners. Vendor evaluation is paramount to achieving this objective.

In accordance with the USFOR-A FRAGO 16-143 MOD 1 Arming Procedures for DoD Contractors, the Armed Contractor Oversight Directorate (ACOD) will "coordinate with contracting agencies, vendors, and their representatives to facilitate the arming authorization process via the web-based Civilian Arming Authorization Management System (CAAMS)". Per the instruction, a Synchronized Pre-Deployment and Operational Tracker (SPOT) employment Letter of Authorization (LOA), DD Form 2760, Law of Armed Conflict/Rules for the Use of Force Training Certification, Acknowledgement of Training,

Weapons Qualifications, and a Background Investigation, must accompany all exception to policy (ETP) contractor requests.

The Civilian Arming Authorization Management System (CAAMS) provides a standardized and automated process for the submission, review, approval, and compliance management of the contractor arming process. Moreover, the application provides both visibility and audibility to capture and report current and potential Contractors' arming information, location, and arming compliance. Most importantly, U.S. Forces and coalition partners, civilians, and contractors could potentially face force protection risks posed by nefarious actors; hence CAAMS is an integral part of the National Defense Security operation. Both web applications are part of the Joint Contingency and Expeditionary Services (JCXS) Portfolio.

Table 1: Collection Authorities

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|--------------------------|----------------|-------------|------------|-----------------------------------|
| Attachmen | Document | Authority | Issuing | Description |
| t | | | Authority | |
| 1 | DTM | Executive | US | Prohibition on Providing Funds |
| | | | Government | to the Enemy and Authorization |
| | | | | of Additional Access to Records |
| 2 | NDAA, Sec. 841 | Legislative | US | Prohibition on Providing Funds |
| | | | Government | to the Enemy |
| NA | FRAGO T-CFLCC | DoD | CENTCOM | Classified; Supports Vendor |
| | 100550Z | | | Vetting |
| | | | | |
| NA | JCXS ATO (2sep | J61 | US | Sensitive; Authorization for JCXS |
| | 20) | | Government | to Operate |
| 3 | FRAGO 16-143 | DoD | CENTCOM | Arming ETP Contractors |
| | MOD-1 | | | |

2. <u>Use of the Information</u>

In accordance with appropriate acquisition policy and regulations, any contractor that wants to conduct business with or on U.S Government/Military installations must be registered through JCXS. Contractors/vendors, the respondents, shall input all company, personal, and employee data into the respective JCXS website (JCCS and/or CAAMS) to enable the U.S Government to ensure the safety of U.S. personnel in theater, and ensure the U.S. Government is not contracting with any enemy entities or potential threats. Prime contractors and their subcontractors are responsible for ensuring the database contains up-to-date, real-time information regarding their identity, employment, finances, affiliations, and other associated documentation.

JCCS is one of the proven acquisition solutions that supports the Procure-to-Pay lifecycle for vendors involved in contingency and expeditionary operations. Through many contracting office correspondences via email, social media, DoD or Federal websites, or by

word of mouth by repeat customers, the JCCS solution is known as an integral part of the U.S. contract award process. Hence, the JCCS collection process is entrenched in the battle rhythm as a trusted repository for vendors. Moreover, the capability was designed to give vendors the option to view the website in their native language via Google Translate. This feature supports the various registration requirements and facilitates an awareness of usage in the vendor community. In the event that a vendor has questions, concerns, and/or issues due to language barriers, the application promptly displays a help desk icon on each webpage for users to access real time support or a written response from the respective site administrators.

The JCXS PMO also has customer support staff that operates during their given time zones and has an onsite resource embedded in various contracting offices to provide immediate assistance. By leveraging the commonly-used internet access process, the user inputs the URL to the secure hosted, 508 compliant JCXS website (https://www.jccs.gov). The vendor is automatically prompted to agree to DOD IA policies and procedures as well as the present and future privacy disclosures.

By navigating through a user-friendly graphical user interface (GUI), the users are prompted to input information thru various formats of drop down lists, radio buttons, picklists etc. The users receive visual notification via red asterisks *-if information is missing or not formatted correctly, as well as on screen notifications during the various process stages of approval. Both JCCS and CAAMS have email notifications for various communications. Please see screenshots that details the complete end to end collection experience.

The information collected is required to maintain the safety of contractors and U.S. armed forces while ensuring the U.S. Government is not doing business with entities at odds with U.S. interests.

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

The use of information technology has been considered appropriate for the purposes of this collection. The Vendors have the ability to input the required information into JCCS and CAAMS, which are secured, web-based systems that the contractors can easily access with the correct right to use. The percentage of annual respondents that complete and submit the collection electronically is 100%. This is due to the data completion in a web based-HTML format.

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

As part of the JCXS platform, JCCS collects information from foreign vendors looking to do business with the U.S. Government OCONUS. The data from SAM (System for Award Management) can be used to pull company information also required by JCCS. What differentiates JCCS from SAM is that SAM can be used to pull U.S. company information while JCCS is able to distinguish foreign vendors from U.S. vendors. Additional data required for contingency operations including financial information (shareholder information), company ownership information, contracts held with the U.S. Government,

subcontractor information, and employee information are not collected by SAM. JCCS is used to collect this data set. There are no known systems used to process ETP contractors' arming requests.

5. Burden on Small Business

The information collection associated with small businesses is the minimum consistent with applicable laws, Executive orders, regulations, and other prudent business practices.

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

Information must be collected annually based on license expirations and other base access requirements.

Information must also be collected as needed to accommodate any changes to base access requirement records and any new requests for contractors to carry arms.

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

There are no special circumstances that require the collection to be conducted in a manner inconsistent with the guidelines 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 Tuesday, November 15, 2022. The 60-Day FRN citation is 87 FR 68474.

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

A 30-Day Federal Register Notice for the collection published on Wednesday, July 26, 2023. The 30-Day FRN citation is 88 FR 48215.

Part B: CONSULTATION

The JCXS system is DIACAP certified having been subjected to and passed thorough security testing and evaluation by independent parties. Consultation takes place through a documented governance process with key stakeholders where the collection is reviewed as required. The information being requested is ordered from an outside sponsoring agency that regulates what information is collected and how frequently it is collected. JCXS does not consult with respondents regarding information posted via the website but rather directs them to the sponsoring agency. Respondents have full access to the JCXS Helpdesk via JCXS webpage for assistance and clarity of the website.

9. <u>Gifts or Payment</u>

There is not any payments or gift provided to respondents, other than remuneration of contractors under their contracts

10. <u>Confidentiality</u>

To meet safeguards specified by the Privacy Act of 1974, JCXS displays a consent message upon accessing the portal and a Privacy Statement on the Vendor log-in page.

The associated SORN (FCENTCOM 05, Contract Employees Vetting and Arming Authorization) can be accessed at the following link: https://www.federalregister.gov/documents/2021/07/20/2021-15392/privacy-act-of-1974-system-of-records.

A copy of the PIA, Vendor Vetting and Arming Authorization, has been provided with this package for OMB's review.

JCXS follows the guidelines for storing, maintaining, and disseminating collected data presented in the DLA Records Schedule-8500 Information Security: Records are temporary. Cutoff at end of Event. Destroy 6 years after password is altered or user account is terminated.

11. Sensitive Questions

Sensitive information collected by JCXS applications include Individual Names, Family information, Company Name and Address, Employee Information (Name, Parents, Phone Number, e-mail address), Company Financial Information, data from/images of Documentation (Passport/Identification Document, Industry Licenses), and Tribe Information.

Vetting cells use the financial information from JCCS collectively to follow money trails of the vendors and ensure funds are not being used to fund terrorist activities. The exact reasons and specific uses or vetting procedures of the collected information are classified and unknown to the system administrators. ACOD collects the information to verify identification, completion of training, and arming request justification.

12. Respondent Burden, and its Labor Costs

Part A: ESTIMATION OF RESPONDENT BURDEN

1) Collection Instruments

JCCS

- a) Number of Respondents: 4,000
- b) Number of Responses Per Respondent: 1
- c) Number of Total Annual Responses: 4,000
- d) Response Time: 30 minutes

e) Respondent Burden Hours: 2,000 hours

CAAMS

- a) Number of Respondents: 1,500
- b) Number of Responses Per Respondent: 1
- c) Number of Total Annual Responses: 1,500
- d) Response Time: 30 minutes
- e) Respondent Burden Hours: 750 hours

2) Total Submission Burden

- a) Total Number of Respondents: 5,500
- b) Total Number of Annual Responses: 5,500
- c) Total Respondent Burden Hours: 2,750 hours

Part B: LABOR COST OF RESPONDENT BURDEN

1) Collection Instruments

JCCS

- a) Number of Total Annual Responses: 4,000
- b) Response Time: 30 minutes
- c) Respondent Hourly Wage: \$21.00
- d) Labor Burden per Response: \$10.50
- e) Total Labor Burden: \$42,000

CAAMS

- a) Number of Total Annual Responses: 1,500
- b) Response Time: 30 minutes
- c) Respondent Hourly Wage: \$21.00
- d) Labor Burden per Response: \$10.50
- e) Total Labor Burden: \$15,750

2) Overall Labor Burden

- a) Total Number of Annual Responses: 5,500
- b) Total Labor Burden: \$57,750

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. <u>Cost to the Federal Government</u>

Part A: LABOR COST TO THE FEDERAL GOVERNMENT

 Collection Instrument(s) JCCS

- a) Number of Total Annual Responses: 4,000
- b) Processing Time per Response: .25 hours
- c) Hourly Wage of Worker(s) Processing Responses: \$24.00
- d) Cost to Process Each Response: \$6.00
- e) Total Cost to Process Responses: \$24,000

CAAMS

- a) Number of Total Annual Responses: 1,500
- b) Processing Time per Response: .25 hours
- c) Hourly Wage of Worker(s) Processing Responses: \$24.00
- d) Cost to Process Each Response: \$6.00
- e) Total Cost to Process Responses: \$9,000
- 2) Overall Labor Burden to the Federal Government
 - a) Total Number of Annual Responses: 5,500
 - b) Total Labor Burden: \$33,000

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: \$0

Part C: TOTAL COST TO THE FEDERAL GOVERNMENT

- 1) Total Labor Cost to the Federal Government: \$33,000
- 2) Total Operational and Maintenance Costs: \$0
- 3) Total Cost to the Federal Government: \$33,000

15. Reasons for Change in Burden

The burden listed above includes the burden of respondents and responses from all of the JCXS applications.

16. Publication of Results

The results of this information collection will not be published.

17. <u>Non-Display of OMB Expiration Date</u>

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.