

SUPPORTING STATEMENT A

United States Park Police Pre-employment Suitability Determination Process OMB Control Number 1024-0245

Terms of Clearance:

Justification

1. Explain the circumstances that make the collection of information necessary. Identify any legal or administrative requirements that necessitate the collection.

The United States Park Police (USPP) is a unit of the National Park Service (NPS), Department of the Interior, with jurisdiction in all National Park Service areas and certain other Federal and State lands. The USPP are highly trained, professional police officers who prevent and detect criminal activity; conduct investigations; apprehend individuals suspected of committing offenses against Federal, State, and local laws; provide protection to the President of the United States and visiting dignitaries; and provide protective services to some of the most recognizable monuments and memorials in the world.

As part of the application process for consideration as a candidate for United States Park Police Officer positions, we collect information from applicants during the Pre-employment Suitability Determination Phase to narrow the list of potential candidates who are qualified to move to the next phase of the application process. The USPP application process consists of 6 phases: (1) Application via USAJobs.com; (2) Pre-employment Suitability Determination; (3) written examination; (4) oral interview; (5) physical and psychological evaluations; and (6) physical efficiency battery tests. Background clearances are not initiated until the candidate has successfully passed all six (6) phases of the USPP application process.

It should be noted that Department of the Interior policy 446 DM 21 states, "No other use of the polygraph is authorized within the Department of the Interior." This directive specifically limits the usage of polygraph technology to criminal investigations. Without this valuable tool as part of our Pre-employment Suitability Determination Phase, the USPP must rely solely on the forms in this information collection request to provide the necessary information for the requested time periods to assist us in conducting pre-employment investigations on each eligible applicant.

Legal Authorities:

- Title 5, United States Code, Sections 1302 and 1304, "Special Authority"
- Title 5, United States Code, Section 3301, "Civil Service; generally"
- Title 18, United States Code, Section 922, "Unlawful acts"
- Executive Order 10450, Sections 8(b), 8(c), and 9(c), "Security requirements for Government employment"
- Title 5, Code of Federal Regulations, Section 5.2, "Investigation and evaluations"

2. Indicate how, by whom, and for what purpose the information is to be used. Except for a new

collection, indicate the actual use the agency has made of the information received from the current collection. Be specific. If this collection is a form or a questionnaire, every question needs to be justified.

The USPP applicant processing team uses *Forms 10-2201 and 10-2201A through D* (we intend to discontinue previously approved Forms 10-2201E and 10-2201F from use as they no longer serve their purpose as described below) to collect information needed as part of the formal pre-employment background investigation process. The information collected is also required to conduct an OPM background investigation, initiated via the e-QIP system once an applicant is selected for employment. The information in all of the forms listed below is required as part of the USPP Pre-Employment Suitability Determination Phase of the application process

Approximately 4,000 to 5,000 individuals apply annually for service wide USPP officer positions posted on continuous USAJOBS announcements. Every quarter, the USPP will request a listing of applicants from the NPS Human Resources Office who will subsequently provide the names of approximately 1,200 to 1,500 individuals. Of this total, approximately 250 applicants will pass initial screening tests and complete the forms as part of the USPP Pre-Employment Suitability Determination. This phase is used to further screen applicants to select only the most qualified candidates to continue the application process.

When an applicant is hired, the completed forms become part of their employee security file. All forms submitted by applicants not selected are secured and destroyed in accordance with the specific document disposal requirements outlined in the NPS Consolidated Service-wide Records Schedule (N1-79-08-4). The records retention requirements are also included on each form.

Form 10-2201, "Personal Qualifications Statement," provides information on the personal history of the candidate. Investigators verify and use the information to determine an applicant's suitability for a USPP officer position. The USPP requires page 29 of Form 10-2201 to be notarized prior to submission. Using the notary process, each applicant is attesting to the completeness and accuracy of each statement made within the form. Any discrepancies in the information submitted during a pre-employment qualification check may be used as a reason to remove the applicant from further consideration. Information collected via Form 10-2201 includes:

1. Personal data

- Name
- Alias, maiden name, nicknames
- Legal name change information
- Date of birth
- Social Security Number
- Gender
- Citizenship/dual citizenship information
- Passport information
- Present and legal addresses
- Contact numbers

2. Selective Service and military service data

- Selective Service registration data
- Applications for military service
- Highest rank held in the military
- Rank at discharge
- Re-enlistment information
- Type and circumstances of discharge
- Disciplinary action during service
- Criminal investigations during service

3. Financial data

- Wage garnishments
- Financial delinquencies
- Tax delinquency
- Liens
- Repossessions
- Civil court actions
- Court-ordered financial judgments
- Bankruptcies/wage earner plans
- Spousal income
- Financial obligations, including type, monthly payment, balance, and to whom owed

4. Detailed information for references

5. Detailed information for personal associates

6. Education data

- High school and college information
- Dates attended
- Characterization of performance
- Disciplinary action during enrollment
- Arrests by college/university police

7. Employment data

8. Driving record

9. Arrest/conviction and criminal history

10. Applicant essay

11. Alcohol usage

12. Criminal history information

13. Education information

14. Gambling information

15. Miscellaneous information (such as firearm permits, special skills, other languages, hobbies, and interests, other enforcement agencies where the applicant applied, and whether or the not applicant previously applied for a USPP officer position)

16. Conditions of Employment

PART I - REQUIRED PAPERS/DOCUMENTS

Old Question	New Question	Reason For Change
Item 1: Birth certificate - Bring the original and a copy to leave with your paperwork	Birth certificate or Naturalization certificate - Bring the original and a copy to leave with your paperwork	For the purpose of clarity, we moved (old) item 6 Naturalization certificate, we included a Naturalization certificate on the same line as Birth certificate.
Item 2: Required High school diploma or GED (only).	Item 2: High school diploma / Transcripts or GED (GED must be accompanied by test scores) - <i>Bring the original and a copy to leave with your paperwork</i>	We added “transcripts” as an option for high school diplomas. Providing a transcript in place of a diploma is sufficient.
Item 3: College transcripts and diploma, upon request.	Item 3: College transcripts (transcripts must be official copies provided by the institution)	We deleted “and diploma” Providing a transcript in place of a diploma is sufficient.

PART I - REQUIRED PAPERS/DOCUMENTS

Old Question	New Question	Reason For Change
	in a sealed envelope), upon request	
Item 5. Selective Service card.	Removed: No requirement for a Selective Service card	The requirement for Selective Service card was removed as we can confirm a male applicant's Selective Service number without the applicant presenting the actual card in the pre-employment investigation.
Item 8. Court orders	NEW Item 6. Court orders (if applicable).	For the purpose of clarity, we added the words "if applicable" to inform the applicant that if the listed items under Court orders are not applicable, then there is no requirement for these documents.
item 9. Driver's license (actual current license and 1 copy (front and back), a certified copy of current license record, and records from all states that have issued you a driver's license for the last 10 years	NEW item 7. Driver's license (actual current license and 1 copy (front and back)), and certified copy of current license record	We removed the time period of 10 years, which seemed excessive and likely an administrative burden for the applicant.
Item 10. One copy of each Federal tax transcripts and state tax forms for the previous two tax years you were required to file returns (including Forms W-2's) (Contact www.irs.gov and each state tax authority you filed in to obtain transcripts and copies of filed returns.)	Item 10. Removed the requirement to produce tax records.	We removed this requirement to reduce the administrative burden on the applicant. Questions to obtain financial data and ask questions about delinquent income or other tax payments in Part IV – Financial Data.
Item 11 Credit report obtained from www.equifax.com after the opening date of this current vacancy announcement.	Removed the requirement for a credit report.	We removed the requirements to submit a copy of the credit report. Applicants must first sign to release the credit report before our investigation. If there are credit issues, the investigators can question the applicant as part of their pre-employment investigation.

Section	Question	Reason For Change
Part VIII. Employment Data Item 8.	We added a section for the applicant to provide ten (10) years of employment history.	Part VIII. Employment Data Item 8.
Part XI. Miscellaneous	Item 4. List any special skills you possess that you believe may be applicable to the position for which you are applying (skills with equipment, public speaking experience, membership in a professional scientific community or other such organization, etc.)	Part XI. Miscellaneous
Part XI. Miscellaneous	Item 5. Are you able to communicate in any language other than English (including sign language)?	We added this requirement to provide a matrix to comparatively evaluate or grade the essay.
Part XII – Applicant Essay.	Removed the essay as a requirement.	We removed this requirement because there was no valid matrix to comparatively evaluate or grade the essay.

NEW Content

Section	Question	Reason For Change
Part VIII. Employment Data	Item 8. We added a section (Pages 17 and 18) for the applicant to provide ten (10) years of employment history.	This section will assess the applicant's prior work history, confirm their reasons for leaving previous employment, and to help assess their qualifications for becoming a USPP police officer.
Part XI. Miscellaneous	Item 4. <i>"Do you associate or cohabitate with any person who is prohibited from possessing firearms?"</i>	This question helps ensure applicants will be able to safely store their government-issued weapon at their residence.
Part XI. Miscellaneous.	Item 5. <i>"Is there any digital content to include videos, photos, or social media posts that could be used to blackmail you or would cause the loss of public trust/confidence in you as an official representing our agency?"</i>	Because of the increasing significance and scrutiny of online and social media content, we are asking our applicants who may become USPP police officers to self-identify any videos, photos, or social media posts that could depict them engaging in illegal or questionable activities, discriminatory behavior or activities, such that someone could attempt to use this against them and/or to gain favor from a federal law enforcement officer, and/or bring discredit upon the Department of Interior, the National Park Service, or the US Park Police.

Form 10-2201A, "Information Release Form" authorizes the release of personal and confidential records (e.g., medical records concerning physical and mental health) to the USPP necessary to

determine the suitability of the candidate for employment with the USPP. Form 10-2201A must be notarized prior to submission, authorizing third parties (employers, courts, neighbors, etc.) to provide information on behalf of that applicant. The notary seal verifies that each applicant is aware of the usage of the information in this form. Information collected via Form 10-2201A includes:

- Full legal name
- Social Security Number

Form 10-2201B, “Release to Obtain a Credit Report” - authorizes the release of information from consumer reporting agencies to the USPP necessary to determine the suitability of the candidate for employment with the USPP. Information collected via Form 10-2201B includes:

- Full legal name
- Other names used (alias, maiden, nicknames, etc.)
- Date of Birth
- Social Security Number
- Home Telephone Number Current occupation
- Employer name
- Present address
- Previous Address

Form 10-2201C “Lautenberg Certification” - requires information and certification by the applicant regarding a conviction of a misdemeanor crime of domestic violence. Information collected via Form 10-2201C includes:

- Whether candidate has ever been convicted of a misdemeanor crime of domestic violence. If yes, the candidate must provide the court jurisdiction, docket/case number, statute/charge, and the date of sentencing
- Applicant’s full name/signature, and witness’ full name/signature.

Form 10-2201D “Physical Efficiency Battery “Waiver” - provides information about the Physical Efficiency Battery (PEB) test and how physical fitness is measured. The applicant acknowledges their understanding of the PEB and how it is scored. No personal information is collected via Form 10-2201D.

- **Change:** We removed the requirement for the applicant to provide the date of their last medical examination, and the name and address of their medical doctor this information.
 - **Reason For Change:** The USPP no longer requires information about the date of their last medical examination and the name and address of their medical doctor. The USPP will be sending qualified applicants for a specific USPP-based medical examination.
- **New:** “My participation in this event is voluntary and I accept all liability for any injury that my result due to my participation
 - **Reason For Change:** We added this sentence for liability purposes so the applicant acknowledges the PEB is voluntary and they accept all liability for any injury that may result due to their participation in the PEB.

Form 10-2201E Physician Consent Form

- **Removed** The USPP Pre-Employment Physical Efficiency Battery (PEB) does not require a physician to clear or medically qualify the applicant for basic physical activity. Applicants can make the determination themselves if they are medically fit enough to participate in the PEB.

Form 10-2201F Applicant Documentation Form

- **Removed** This hard copy form is no longer necessary. Applicants defer or decline USPP’s offer

of employment through email to NPS Human Resources.

3. Describe whether, and to what extent, the collection of information involves the use of automated, electronic, mechanical, or other technological collection techniques or other forms of information technology, e.g., permitting electronic submission of responses, and the basis for the decision for adopting this means of collection. Also describe any consideration of using information technology to reduce burden and specifically how this collection meets GPEA requirements.

All forms are available as electronic fillable-fileable Microsoft Word document. All applicants must bring printed, hard copies of each completed form when reporting to the Physical Evaluation Phase, to submit to the PEB. All hard copies serve as official, certified submissions to prevent the alteration of information later in the process. The USPP is diligently searching for a software application that will permit applicants to electronically submit their responses to the questions posed in these forms. There are software applications that are currently available; however, many do not meet all the necessary federal requirements. The USPP requires a software application that shall adhere to the Federal Information Processing Standards (FIPS) in order to act in accordance with the Federal Information Security Management Act of 2002 (FISMA) and the Federal Information Security Modernization Act of 2014 (FISMA2014), along with all necessary Federal Risk and Authorization Management Program (FedRAMP) requirements.

4. Describe efforts to identify duplication. Show specifically why any similar information already available cannot be used or modified for use for the purposes described in Item 2 above.

The forms used in this collection are unique to other Federal law enforcement hiring processes due to DOI's prohibition to utilize the polygraph as part of the screening process. The completion of these forms is specific to the USPP Pre-employment Suitability Determination Phase necessary to determine whether the candidate is suitable prior to initiating the formal background investigation phase. There is no single form or additional source of information publicly available to access personal history needed to screen candidates for the critical sensitive position of a USPP officer.

5. If the collection of information impacts small businesses or other small entities, describe any methods used to minimize burden.

This collection of information does not impact small businesses or other small entities.

6. Describe the consequence to Federal program or policy activities if the collection is not conducted or is conducted less frequently, as well as any technical or legal obstacles to reducing burden.

If this information is not collected, the USPP will not adequately be able to screen applicants for USPP officer positions. This would adversely affect the protection and preservation of monuments and memorials, the protection of visitors, and our ability to detect and deter crime.

7. Explain any special circumstances that would cause an information collection to be conducted in a manner:

- * require respondents to report information to the agency more often than quarterly;
- * requiring respondents to prepare a written response to a collection of information in fewer than 30 days after receipt of it;
- * requiring respondents to submit more than an original and two copies of any document;
- * requiring respondents to retain records, other than health, medical, government contract, grant-in-aid, or tax records, for more than three years;
- * in connection with a statistical survey that is not designed to produce valid and reliable results that can be generalized to the universe of study;
- * requiring the use of a statistical data classification that has not been reviewed and approved by OMB;
- * that includes a pledge of confidentiality that is not supported by authority established in statute or regulation, that is not supported by disclosure and data security policies that are consistent with the pledge, or which unnecessarily impedes sharing of data with other agencies for compatible confidential use; or
- * requiring respondents to submit proprietary trade secrets, or other confidential information, unless the agency can demonstrate that it has instituted procedures to protect the information's confidentiality to the extent permitted by law.

There are no circumstances requiring this collection of information in a manner inconsistent with OMB guidelines.

8. If applicable, provide a copy and identify the date and page number of publication in the Federal Register of the agency's notice, required by 5 CFR 1320.8(d), soliciting comments on the information collection prior to submission to OMB. Summarize public comments received in response to that notice and in response to the PRA statement associated with the collection over the past three years, and describe actions taken by the agency in response to these comments. Specifically address comments received on cost and hour burden.

Describe efforts to consult with persons outside the agency to obtain their views on the availability of data, frequency of collection, the clarity of instructions and recordkeeping, disclosure, or reporting format (if any), and on the data elements to be recorded, disclosed, or reported.

Consultation with representatives of those from whom information is to be obtained or those who must compile records should occur at least once every three years — even if the collection of information activity is the same as in prior periods. There may be circumstances that may preclude consultation in a specific situation. These circumstances should be explained.

On September 12, 2022, we published in the Federal Register (87 FR 55847) a notice of our intent to request that OMB renew this information collection. In the notice, we solicited comments for 60 days, ending on November 14, 2022. We did not receive any public comments on this notice. In addition to the Federal Register notice, we emailed Nine (9) former applicants to get feedback on the questions

related to obtain their views on the availability of data, frequency of collection, the clarity of instructions. We received feedback five respondents.

Position	Affiliation
1. Applicant	current USPP officer
2. Applicant	current USPP officer
3. Applicant	current USPP officer
4. Applicant	current USPP officer
5. Applicant	current USPP officer

“Whether or not the collection of information is necessary, including whether or not the information will have practical utility; whether there are any questions they felt were unnecessary.”

Respondents’ comment(s):

1. “I felt that the background investigation and personal qualification statement asked for pertinent information, nothing more, nothing less.”
2. “I felt everything that was asked of me was necessary and not too much to ask of an individual. It felt there was a purpose behind everything asked of me to make sure all information was accurate.”
3. “Yes, I believe this information would be necessary and would have practical utility.”
4. “For the most part I thought that all of the paperwork we were asked to fill out was necessary for the position. The only document that I had any questions about was the physician consent form. If you are going to take a physical test for a job demanding some level of physical activity you should be able to complete the set tasks in the time hack assigned. But, looking at it from the United States Park Police point of view I understand the necessity of the form to cover the agency from any lawsuit or litigation.”
5. “I believe that the collection of this information was definitely necessary. Especially since applicants are applying for a law enforcement position in the federal government. That being said, the hiring agency should have as much information as possible on the applicant before deciding whether or not he/she is deserving to work for them. By collecting this information the hiring agency will get the full picture of who the applicant really is and determine if they’ll be a good fit for them and the US Government. I don’t believe there were any questions that were unnecessary.”

NPS Response/Action Taken: *All five (5) of the respondents agreed that the collection of the information was necessary and had practical utility. One (1) respondent did question the utility of Form 10-2201E, Physicians Consent Form. This form is being deleted as one of the US Park Police Pre-Employment Suitability Forms.*

“What is your estimate of the amount of time it takes to complete each form in order to verify the accuracy of our estimate of the burden for this collection of information?”

Respondents’ comment(s):

1. “I was able to complete all of the forms in a matter of hours over the course of a few days. I did not find it to be too time consuming of a task.”
2. “The forms ranged of different times depending how much information was needed but everything felt necessary, so it didn’t feel as if it were a waste of time.”
3. The applicant indicated the Form 10-2201 took approximately 1 – 1.5 hours to complete. The applicant indicated that it took 5 minutes to complete each of the other forms.
4. “Most of the forms took a matter of minutes to fill out. Whichever form had all the background information on it (either the Form 10-2201, Personal Qualifications Statement, or Form 10-2201F, Applicant Documentation Form) took close to a week to fill out.”
5. “I don’t recall how long it took me to complete all the forms, but I believe it took me a few days to complete

the Personal Qualification Statement. What took the longest though was definitely trying to gather all of the required papers/documents.”

NPS Response/Action Taken: *The responses from the respondents varied greatly. One applicant stated she completed all the forms in under two (2) hours. The other respondents did comment that Form 10-2201, Personal Qualifications Statement, did take a significantly longer amount of time to complete. Another respondent commented on the amount of time necessary to gather all the required papers/documents. The USPP is removing two (2) Forms from the Pre-Employment Suitability Form package: Form 10-2201E, Physicians Consent Form, and Form 10-2201F, Applicant Document for Deferment. The USPP is eliminating the written essay requirement in Form 10-2201 which will reduce the amount of time necessary to complete this form. The USPP is eliminating the requirement for an applicant to produce the original high school diploma and/or college diploma. The USPP will accept high school and/or college transcripts in lieu of the actual diploma. The USPP is eliminating the requirement for male applicants to produce their Selective Service Card. The USPP is eliminating the requirement for the applicant to produce a credit history report.*

“Do you have any suggestions for us on ways to enhance the quality, utility, and clarity of the information to be collected?”

Respondents’ comment(s):

1. “No. Providing a PDF document that was able to be edited and typed on the computer is extremely convenient.”
2. “For the amount of information and paperwork asked of us, nothing was repeated or unnecessary. Unless there is a way to have an applicant portal where they submit each document into an online system, this way there is less physical paperwork being printed and transferred from one person to the next.”
3. “No, I believe everything is relatively straightforward and simple.”
4. “The only change that I would look at making is extending the amount of time to fill out the background questionnaire.”
5. “I don’t have any suggestions at this time.”

NPS Response/Action Taken: *The five (5) respondents did not any significant feedback as how to enhance the quality, utility, and clarity of the information being collected.*

“Any ideas you might suggest which would minimize the burden of the collection of information on respondents?”

Respondents’ comment(s):

2. “An applicant portal would be my only suggestion so paperwork can be submitted without all the printout to minimize the amount of paper. Other than that, the data collected seemed to be necessary.”
3. “Attempting to find ways to combine some of these documents or eliminating documents would be a great start but I do not see how that is possible.”
4. “When I received everything, I did feel a little overwhelmed with the amount of information/paperwork/documents that were requested all at once. I would suggest for this maybe breaking it up. Send a few requested documents to complete one day, have us complete it/send it back to you on a specific due date, then send the other requested documents and repeat the cycle like that.”

NPS Response/Action Taken: *As previously stated, the USPP is diligently searching for a software application that will permit applicants to electronically submit their responses to the questions posed in these forms. There are software applications that are currently available; however, many do not meet all the necessary federal requirements. The USPP requires a software application that shall adhere to FIPS in order to act in accordance with FISMA and FISMA2014, along with all necessary FedRAMP requirements.*

9. Explain any decision to provide any payment or gift to respondents, other than remuneration of contractors or grantees.

We do not provide any payments or gifts to respondents.

10. Describe any assurance of confidentiality provided to respondents and the basis for the assurance in statute, regulation, or agency policy.

Submitted forms are stored in compliance with OPM/Govt-5 (79 FR 16834). All hard copies of forms are kept in secure areas, locked file cabinets, and treated as confidential information. Only individuals with a need to use the information have access. The information collection complies with the Privacy Act of 1974 and OMB Circular A-130. Such information may be exempt from disclosure under the FOIA (5 U.S.C. 552).

11. Provide additional justification for any questions of a sensitive nature, such as sexual behavior and attitudes, religious beliefs, and other matters that are commonly considered private. This justification should include the reasons why the agency considers the questions necessary, the specific uses to be made of the information, the explanation to be given to persons from whom the information is requested, and any steps to be taken to obtain their consent.

We ask questions of a personal nature essential to determining the suitability of an applicant for employment as a USPP officer; however, we do not ask sensitive questions such as those described above.

12. Provide estimates of the hour burden of the collection of information. The statement should:

- * Indicate the number of respondents, frequency of response, annual hour burden, and an explanation of how the burden was estimated. Unless directed to do so, agencies should not conduct special surveys to obtain information on which to base hour burden estimates. Consultation with a sample (fewer than 10) of potential respondents is desirable. If the hour burden on respondents is expected to vary widely because of differences in activity, size, or complexity, show the range of estimated hour burden, and explain the reasons for the variance. Generally, estimates should not include burden hours for customary and usual business practices.
- * If this request for approval covers more than one form, provide separate hour burden estimates for each form and aggregate the hour burdens.
- * Provide estimates of annualized cost to respondents for the hour burdens for collections of information, identifying and using appropriate wage rate categories. The cost of contracting out or paying outside parties for information collection activities should not be included here.

We estimate that there will be approximately 1,250 annual responses totaling 1,897 annual burden hours. We estimate the total dollar value of the annual burden hours for this collection to be \$81,705 (rounded). We used the rates listed below in accordance with Bureau of Labor Statistics news release

[USDL-23-1305](#) (June 16, 2023, Employer Costs for Employee Compensation—March 2023), to calculate the total annual burden. We used the hourly rate of \$43.07 (Including benefits) for civilian workers (Table 12.1).

Table 12.1. Estimated dollar value of annual burden hours

Activity	Total Annual Responses	Completion Time per Response	Total Annual Burden Hours *	Hourly Labor Costs including Benefits	Total Dollar Value of Annual Burden Hours
Form 10-2201 - Personal Qualifications Statement	250	7 Hours	1,750	\$43.07	\$75,373
Form 10-2201A - "Information Release Form"	250	15 Min	63	\$43.07	\$2,713
Form 10-2201B - Release to Obtain a Credit Report	250	10 Min	42	\$43.07	\$1,809
Form 10-2201C - Lautenberg Certification	250	5 Min	21	\$43.07	\$905
Form 10-2201D - Physical Efficiency Battery Waiver	250	5 Min	21	\$43.07	\$905
Total:	1,250		1,897		0

* Rounded to match ROCIS

13. Provide an estimate of the total annual non-hour cost burden to respondents or recordkeepers resulting from the collection of information. (Do not include the cost of any hour burden already reflected in item 12.)

- * The cost estimate should be split into two components: (a) a total capital and start-up cost component (annualized over its expected useful life) and (b) a total operation and maintenance and purchase of services component. The estimates should take into account costs associated with generating, maintaining, and disclosing or providing the information (including filing fees paid for form processing). Include descriptions of methods used to estimate major cost factors including system and technology acquisition, expected useful life of capital equipment, the discount rate(s), and the time period over which costs will be incurred. Capital and start-up costs include, among other items, preparations for collecting information such as purchasing computers and software; monitoring, sampling, drilling and testing equipment; and record storage facilities.
- * If cost estimates are expected to vary widely, agencies should present ranges of cost burdens and explain the reasons for the variance. The cost of purchasing or contracting out information collection services should be a part of this cost burden estimate. In developing cost burden estimates, agencies may consult with a sample of respondents (fewer than 10), utilize the 60-day pre-OMB submission public comment process and use existing economic or regulatory impact analysis associated with the rulemaking containing the information collection, as appropriate.
- * Generally, estimates should not include purchases of equipment or services, or portions thereof, made: (1) prior to October 1, 1995, (2) to achieve regulatory compliance with requirements not associated with the information collection, (3) for reasons other than to provide information or keep records for the government, or (4) as part of customary and usual business or private practices.

The total non-hour annual cost burden is **\$26,750** broken down as follows:

Forms 10-2201 and 10-2201A - Although Forms 10-2201 and 10-2201A are available in a fillable

format, applicants must print the form and have it notarized. We estimate the cost for the notarization fee for each form is approximately \$10.00.

Supporting Documents - Applicants must supply a variety of supporting documents (see page 1 of Form 10-2201). The average non-hour burden cost to obtain, copy, or notarize/certify these documents will vary depending upon the number and type of documents required to support claims of education, driver's license history, tax history, marital history, military service, court information etc. (Table 13.1)

We estimate the average cost for providing supporting documents to be:

Table 13.1. Estimate of the total annual non-hour cost burden

Supporting Documents	Average Cost	Average Number of Copies	Estimated Cost per Respondent	Estimated Number of Responses	Estimated Total Non-hour Annual Cost Burden
Notary	\$10	2	\$20	250	\$5,000
Certified drivers record	\$15	1	\$15	250	\$3,750
Legal records	\$5	3	\$15	250	\$3,750
Court records	\$10	1	\$10	250	\$2,500
Education transcripts	\$20	2	\$40	250	\$10,000
Tax transcripts	Free	0	0	250	0
Credit report	Free	0	0	250	0
Military records	Free	0	0	250	0
Printing cost per page form	\$0.10	70	\$7	250	\$1,750
			0		\$26,750

14. Provide estimates of annualized cost to the Federal government. Also, provide a description of the method used to estimate cost, which should include quantification of hours, operational expenses (such as equipment, overhead, printing, and support staff), and any other expense that would not have been incurred without this collection of information.

We estimate the annual cost to the government for this collection of information to average **\$185,380 (rounded)**. Table 14.1 below shows the average hourly rate for the Federal staff associated with this information collection. We used the Office of Personnel Management Salary Table [2023-DCB](#) to determine the hourly rates for the staff in General Schedule Positions (Background Investigators and HR Specialists). We multiplied the hourly rate by 1.6 to account for benefits (in accordance with the same BLS news release [USDL-23-1305](#) mentioned above). To determine hourly wage rates for US Park Police (Sergeant and Private), we used Salary Table 2023 – United States Park Police FPPS Table Number 41080, Washington, DC

Table 14.1. Annualized cost to the Federal government

US Park Police	Hourly Rate	Hourly rate with benefits (1.6 x hourly rate, rounded)**	Estimated hours of time spent on collection/ review work	# of positions	Annualized Costs
Sergeant (4/7 - 8)	\$53.43	\$85	500	1	\$42,500
Private (1/1 - 8)	\$45.45	\$73	250	4	\$73,000
				Subtotal	0

Federal Staff	Hourly Rate	Hourly rate with benefits (1.6 x hourly rate, rounded)**	Estimated hours of time spent on collection/review work	Annualized Costs
Personnel Security Specialist (12/9)	\$57.17	\$92	250	\$23,000

Table 14.1. Operational Expenses

Contract Staff	Hourly Rate	Estimate Hours	Number of Positions	Annualized Costs
Background Investigators (NEW Solutions contractors)	\$46.88	500	2	\$46,880

15. Explain the reasons for any program changes or adjustments in hour or cost burden.

With this renewal, the program anticipates receiving fewer applications based on the number of applicants received since the last renewal in 2019. This estimate reflects an overall net decrease in the number of responses (n= -8,962), burden hours (n= -11,420), and the annual cost burden (n= -155,150) associated with this collection. The request to remove/discontinue the use of Forms 10-2201E Physician Consent Form and 10-2201F Applicant Documentation Form is indicated in Item 2 above.

	Annual Number of Responses			Annual Time Burden			Annual Cost Burden		
	Previously Approved	Current Request	Net Change	Previous y Approved	Current Request	Net Change	Previously Approved	Current Request	Net Change
Form 10-2201	1,700	250	-1,450	11,900	1,750	-10,150	181,815	26,738	-155,077
Form 10-2201 A	1,700	250	-1,450	425	63	-362	17	3	-14
Form 10-2201 B	1,700	250	-1,450	283	42	-241	17	3	-14
Form 10-2201 C	1,700	250	-1,450	142	21	-121	17	3	-14
Form 10-2201 D	1,700	250	-1,450	283	21	-262	17	3	-14
<i>Subtotal</i>	0	0	0	0	0	0	0	0	0
Removed									
Form 10-2201 E	1,700	0	-1,700	283	0	-283	17	0	-17
Form 10-2201 F	12	0	-12	1	0	-1	0	0	0
<i>Subtotal</i>	0	0	0	0	0	0	17	0	0
TOTAL	10,212	1,250	-8,962	13,317	1897	11,420	181,900	26,750	155,150

16. For collections of information whose results will be published, outline plans for tabulation and publication. Address any complex analytical techniques that will be used. Provide the time schedule for the entire project, including beginning and ending dates of the collection of information, completion of report, publication dates, and other actions.

We will not publish the results of this information collection.

17. If seeking approval to not display the expiration date for OMB approval of the information collection, explain the reasons that display would be inappropriate.

We will display the OMB control number and expiration date on all forms.

18. Explain each exception to the topics of the certification statement identified in "Certification for Paperwork Reduction Act Submissions."

There are no exceptions to the certification statement.