1**Supporting Statement A for**

Paperwork Reduction Act Submission

NATIONAL PARK SERVICE

BACKGROUND INVESTIGATION/CLEARANCE INITIATION REQUEST

OMB Control Number 1024-0282

Terms of Clearance. None.

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

As delegated by the U.S. Office of Personnel Management (OPM), the National Park Service (NPS) is authorized to request information required to determine the suitability of applicants for Federal employment and non-Federal personnel (i.e., contractors, partners, etc.).

In line with regulations mandated by OPM and the Department of the Interior (DOI), NPS Personnel Security Branch utilizes the National Background Investigation Services (NBIS) Electronic Application (eApp) System. e-App is a web-based automated system designed to facilitate the processing of standard investigative forms used when conducting background investigations for Federal security, suitability, fitness and credentialing purposes. e-App allows the user to electronically enter, update and transmit their personal investigative data over a secure internet connection to a requesting agency.

Legal Authorities

- Executive Order 10450 - *Security requirements for Government employmen*t.
- Order 10577 - Amending the Civil Service Rules and authorizing a new appointment system for the competitive service
- 5 USC 3301 – *Civil Service; Generally*
- 5 USC 3302 – *Competitive Service; Rules*
- 5 USC 9101 – *Access to criminal history records for national security and other purposes*

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 National Park Service uses Form 10-152, "Background Investigation/Clearance Initiation Request" to collect the information needed to create e-App user accounts. This information must be collected in order to initiate background investigations and identity verification requirements for all individuals requiring the use of e-App and access to NPS facilities, property, networks, and/or receive a DOIAccess PIV badge. Each data segment of the form is necessary to create the NBIS-eApp and DOIAccess accounts for each individual.

Form 10-152 is also used by the NPS to determine:

(1) Whether the proposed candidate has ever been investigated by another federal agency; and

(2) If the candidate was investigated by another federal agency; they must provide the name of that agency and the date of the investigation.

Applicants for federal employment will complete the form 10-152. This includes non-federal personnel, contractors, and individuals not otherwise directly employed by the Federal Government - those who perform work for or on behalf of the Federal Government and will require access to NPS facilities, property, networks and/or receive a DOIAccess PIV badge.

The following information is collected from each proposed candidate requiring a background clearance:

- Full legal name
- Social Security Number
- Date and place of birth
- Country of citizenship
- Contact phone number
- Email address
- Home address

Additional information is required on Form 10-152 for non-federal personnel including:

- Name of proposed candidate's company
- Contract/agreement number
- Contract/agreement periods of performance

With this renewal, we're proposing to update the name of the form from National Park Service Background Clearance Initiation Request to National Park Service *Investigation*/Background Clearance Initiation Request. Adding "*Investigation*" to the form clarifies the purpose and intent of the form.

The table below provides the justification updates to the form.

Section	Field	Justification for update/change
Section 1 (Applicant Section)	Category of Applicant; the options for “Applicant for Non-Federal Personnel” are expanded to “Contractor”, “Associate”, “Partner”, “Intern”, “Volunteer”, and “Other”	This is to clarify the distinction between the different types of Non-Federal Affiliation. Different affiliation types are required to provide specific information for fields in DOIAccess.
Section 2 (Agency Sponsor)	Type of Background Investigation Requested: Low Tier (LT), Mid Tier (MT), High Tier (HT)	The federal personnel vetting model is changing in FY 2024. The background investigation Tiers are being redesignation from Tier 1, Tier 2, Tier 3, Tier 4, and Tier 5 to Low Tier, Mid Tier, and High Tier.
	Card Ship Facility and Address: City, State, Zip code	The NPS PIV Card Sponsor requires this information to ensure the PIV card is delivered to the closest card ship site for pick-up and activation.
	Federal Emergency Response Official (FERO): Yes or No	The NPS PIV Card Sponsor requires this information to ensure the required FERO is printed on the PIV card prior to issuance.
	Network Access: Yes or No	The NPS PIV Card Sponsor requires this information to ensure a network account is created in DOIAccess.
	UPN:	The NPS PIV Card Sponsor required this information to ensure a new UPN is not created when there is a UPN in the system for the card holder.

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.

A hard copy version of the form is provided to new hires or contractors. The form is available electronically, by request, in a fillable/printable format. Completed forms can be either submitted electronically (98%) using encrypted email or hard copy via postal mail (2%).

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.

There is no duplication. All information collected is specific to each applicant for federal and non-federal employment in order to initiate the background investigation/ clearance process.

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

   This collection does not affect 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.**

   This information is required on a one-time basis (per respondent) to initiate the appropriate background clearance. Without this information, the NPS Personnel Security Branch staff will be unable to create accounts in NBIS-eApp.

7. **Explain any special circumstances that would cause an information collection to be conducted in a manner:**
   * **requiring 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 special circumstances that would cause us to collect the 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 notice (87 FR 55848) our intent to request that OMB approve this information collection. In that notice, we solicited comments for 60 days, ending on November 14, 2022. We did not receive any comments in response to that Notice.

In addition to the Federal Register notice, we reached out to a number of individuals about their use of the application and the amount of time it typically takes them to record an observation. The following table includes the titles and organizations of the individuals providing feedback to our request.

Position	Affiliation
1. Supervisory Personnel Security Specialist	Intermountain Region (IMRO)
2. Personnel Security Specialist	National Capital Region (NCA)
3. Chief, Personnel Security Identity Management	Pacific West Region (PWR)
4. Supervisory Personnel Security Specialist	Northeast Region (NER)

"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."

Comment #1:
Section 1 -

- Category of applicant - this should be in Section 2
- "Have you ever had an HSPD-12 background..." and following blocks - this is unnecessary as we will look them up in CVS, and they usually do not know the info asked.

Section 2

- need box for "Childcare" BI, and "FP SAC only"
- why are there two "organization" blocks? How about a block for sponsor email address and applicant position title and duty station?

NPS Response/Action Taken:
The "Have you ever had a HSPD-12 background... question has been removed from the form. PERSEC will check prior investigation history regardless of the applicant's response. Childcare and FP SAC only options have been added.

Comment #2:
What I believe is not needed:

- Have you ever had a HSPD-12 background clearance initiated by another FEDERAL AGENCY?"
- Category of Applicant

- Section III Additional Information Required for Proposed Contractors/Partners/Non-Federal Personnel (Make it simple: Associate/ Contractors)

NPS Response/Action Taken:
The "Have you ever had a HSPD-12 background... question has been removed from the form. PERSEC will check prior investigation history regardless of the applicant's response. The Category of Applicant has been expanded in Section 1, all federal hires are not processed via USAS nor does each PERSEC office have an internal system database system to submit PERSEC requests.

Comment #3:
The 10-152 would not be beneficial to PWR PSIM due to the automated system that is used by PWR (HR Portal). The Portal provides all pertinent information that is outlined in the 10-152 and is supplied by the Hiring Manager, Supervisor, Requesting official.
The 10-152 would create extra work for the PWR PSIM team.

NPS Response/Action Taken:
NPS is developing a universal database system for submission of PERSEC requests. However, until that system is fully developed and implemented the 10-152 form is required.

"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?"

Comment #1:
Seems like it would take 2 minutes for the applicant and maybe 3-4 minutes for the requestor assuming they have the info needed like account number, contract number and so on.

NPS Response/Action Taken:
With the required information in hand, the form should take 5 minutes total to complete all 3 sections.

Comment #2:
- A lot of back and forth in emails

NPS Response/Action Taken:
NPS PERSEC will reduce the back and forth by issuing clear guidance and holding periodic training for CORs, Admin Assistants, and hiring officials.

Comment #3:
The 10-152 would take several hours to complete for each request as the form must be emailed to the requesting official and returned, verified for accuracy, and possibly returned again to complete. We used similar forms in the past and on many occasions, information was left blank by the requestor.

NPS Response/Action Taken:
NPS PERSEC will reduce the back and forth by issuing clear guidance and holding periodic training for CORs, Admin Assistants, and hiring officials.

Comment #4:
The time it would take the applicant to complete the form should be no more than 15 minutes. The time it would take the sponsor/requestor to complete the form should be no more than 10 minutes.

NPS Response/Action Taken:
NPS PERSEC will reduce the back and forth by issuing clear guidance and holding periodic training for CORs, Admin Assistants, and hiring officials.

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

Comment #1:
Needs to be clearer as to what parts are for contractor vs the other types of non-feds. We do need the from/to dates for all non-feds.

NPS Response/Action Taken:
NPS PERSEC will reduce the back and forth by issuing clear guidance and holding periodic training for CORs, Admin Assistants, and hiring officials.

Comment #2:
- Type of background requested, can be updated to T1, TI with child care, T2 fee collectors, T2 fee with childcare
- Combine Section II and III

NPS Response/Action Taken:
Childcare, FP SAC ONLY and Fee Collection options are added in Section 2. Sections 2 and 3 will remain separate, the form is most used for non-feds but not all federal hires are onboarded via USAS.

Comment #3:
Yes, the PWR HR Portal format should be implemented for PSIM NPS-wide, it is a one-stop shop where all information outlined on the 10-152 is provided and the requesting official cannot submit their request without providing all information. All pertinent fields are required. No email exchange is needed.

NPS Response/Action Taken:
NPS is developing a universal database system for submission of PERSEC requests. However, until that system is fully developed and implemented the 10-152 form is required.

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

Comment #1:
This form and the OF-306 are not needed for Federal Employment, as the OF-306 and all the info gathered on the 10-152 form are available in USA Staffing. It concerns me that Section 1 is to be completed by the applicant and sent with the OF-306 to the sponsor/requestor (usually the supervisor). How will the use of this form protect the PII of an applicant?

NPS Response/Action Taken:
All federal hires are not onboarded via USAS. Therefore, the availability of the 10-152 as an alternative is still warranted. Proper guidance and training will reduce the risk of PII breaches including mandating the encryption (password-protection) requirement.

Comment #2: -
Launch a secured 365 Microsoft form – Online.

NPS Response/Action Taken:
NPS will consider developing and launching a secured 365 Microsoft form version for use.

Comment #3:
Yes, the PWR HR Portal format should be implemented for PSIM NPS-wide, It is a one-stop shop where all information outlined on the 10-152 is provided and the requesting official cannot submit their request without providing all information. All pertinent fields are required. No email exchange is needed.

NPS Response/Action Taken:
NPS is developing a universal database system similar to the PWR portal for submission of PERSEC requests. However, until that system is fully developed and implemented the 10-152 form is required.

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

We do not provide 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.

We do not provide any assurance of confidentiality. The information is protected in accordance with the Privacy Act, and we will maintain the information in a secure system of records (Interior/DOI-45, "HSPD-12: Identity Management System and Personnel Security Files," 86 FR 50156; September 7, 2021).

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 do not ask questions of a sensitive nature.

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 used Bureau of Labor Statistics News Release published on September 12, 2023 (USDL-23-1971) Employer Costs for Employee Compensation–June 2023 to calculate the total annual burden. Table 1 lists the hourly rate for all workers $43.26, including benefits.

We estimate that we will receive 6,500 annual responses totaling 758 annual burden hours. We estimate the dollar value of the burden hours is $ 32,791(758 x 43.26). We believe our estimate of 7 minutes to complete an application reflects the average time to complete an application, including time for reviewing instructions, gathering and maintaining data, and completing and reviewing the form.

Table 12.1 Estimated Annual Hour Burden

Activity	Number of Annual Responses	Completion Time per Response (Minutes)	Total Annual Hours	Hourly Rate with Benefits	$ Value of Annual Burden Hours
NPS Form 10-152 “Background Clearance Initiation Request”	6,500	7	758	$43.26	$32,791

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.**

There are no non-hour burden costs.

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.

The annual cost to the Federal Government to administer this information collection is approximately $1,075,295 (rounded) (6,500 applications x $165.43 (weighted average from below).

To determine hourly wage rates, we used the Office of Personnel Management Salary Table 2023-RUS as an average nationwide rate. The benefits rate was obtained from Bureau of Labor Statistics News Release published on September 12, 2023 (USDL-23-1971) Employer Costs for Employee Compensation–June 2023 to calculate the total annual burden.

Table 14.1 Estimated Weighted Annualized Cost to the Federal Government

Position (Grade/Step)	Hourly pay rate	Hourly rate including benefits (1.6 x hourly rate)	Time Spent on Collection	Weighted average
Security Officer (GS-14/05)	$63.21	$101.14	15%	$15.17
Security Specialist (GS-11/05)	37.53	60.05	100%	60.05
Personnel Security Assistant (GS -7/5)	25.36	40.58	100%	40.58
Personnel Security Assistant (GS-09/05)	31.02	49.63	100%	49.63
			Cost per Submission	**$165.43**

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

There are no changes.

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 do not publish this information.

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 forms and other appropriate materials.

18. Explain each exception to the certification statement.

There are no exceptions to the certification statement.