

**SUPPORTING STATEMENT FOR  
CONTRACTOR FITNESS/SECURITY SCREENING REQUEST FORM  
OMB Control No.: XXXX-NEW  
COLLECTION INSTRUMENT(S): DHS FORM 11000-25**

**A. Justification**

1. Explain the circumstances that make the collection of information necessary. Identify any legal or administrative requirements that necessitate the collection. Attach a copy of the appropriate section of each statute and regulation mandating or authorizing the collection of information.

**RESPONSE:** This collection of information is necessary to initiate the contractor fitness screening process for determining whether a person (i.e., the respondent) who has been invited to perform work under a contract for, or on behalf of the Department of Homeland Security (DHS), should be deemed fit to perform such work and eligible for logical and/or physical access to DHS resources based on the risk levels of the designated position. The respondent is responsible for providing and/or verifying information to complete Section II of DHS Form 11000-25; the remaining sections of DHS Form 11000-25 (Sections I, III, and IV) are completed by DHS federal employees. Authorities that support this information collection include:

- Executive Order (EO) 9397, *Numbering System for Federal Accounts Relating to Individual Persons, as amended by EO 13478, Amendments to EO 9397 Relating to Federal Agency Use of Social Security Numbers*
- EO 10577, *Amending the Civil Service Rules and Authorizing a New Appointment System for the Competitive Service*
- EO 13467, *Reforming Processes Related to Suitability for Government Employment, Fitness for Contractor Employees, and Eligibility for Access to Classified National Security Information*
- EO 13764, *Amending the Civil Service Rules, Executive Order 13488, and Executive Order 13467 To Modernize the Executive Branch-Wide Governance Structure and Processes for Security Clearances, Suitability and Fitness for Employment, and Credentialing, and Related Matters*
- Title 5, Code of Federal Regulations (CFR), Part 731, *Suitability*
- Title 5, CFR, Part 732, *National Security Positions*
- Federal Acquisition Regulation (FAR) 52.204-2, *Security Requirements*
- FAR 52.204-9, *Personal Identity Verification of Contractor Personnel*
- Homeland Security Presidential Directive 12

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.

**RESPONSE:** This is a new information collection. DHS collects this information from

the respondent, so Personnel Security entities can initiate the appropriate screening process for determining whether the respondent should be deemed fit to perform work under a contract for, or on behalf of DHS, and eligible for logical and/or physical access to DHS resources based on the risk levels of the designated position.

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.

**RESPONSE:** This information collection utilizes an automated technological solution (i.e., Personnel Security Forms application) which negates the need for a paper-based DHS Form 11000-25, thereby reducing the burden on the respondent during the initiation phase of the contractor fitness screening process. After receiving an invitation to perform work under a contract, the respondent (i.e., DHS contractor applicant) submits and verifies certain biographical information (e.g., full name, position title, SSN, gender, date and place of birth, U.S. citizenship status, telephone number, and email address) through a public-facing web portal. Once the information intake is complete, the Personnel Security Forms application produces an automated electronic version of the DHS Form 11000-25 for use by the appropriate Personnel Security entities to make a fitness determination.

Program office completed a usability testing to determine the accuracy of the time burden estimate. The program found that the estimate of 15 minutes was accurate. Respondents were able to read the instructions and complete the data elements of Section II within the estimated time. As a result, no changes were made to the time burden estimate.

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.

**RESPONSE:** This information collection occurs only after the respondent has been invited to potentially perform work under a contract for, or on behalf of DHS. Any demographic information pertaining to the respondent previously available to DHS cannot be used to initiate a fitness screening until it has been received and verified by the respondent.

5. If the collection of information impacts small businesses or other small entities (Item 5 of OMB Form 83-I), describe any methods used to minimize burden.

**RESPONSE:** This information collection does not have an impact on 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.

**RESPONSE:** The information collection for DHS Form 11000-25 is voluntary; however, failure to provide this information may delay or prevent an individual's fitness determination and eligibility for physical and logical access to federally controlled facilities or information systems.

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 secret, 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.

**RESPONSE:** The special circumstances contained in item 7 of this Supporting Statement are not applicable to this information collection.

8. If applicable, provide a copy and identify the data 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 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 3 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.

**RESPONSE:** In accordance with 5CFR 1320.8(d), a 60-day notice for public comment was published in the Federal Register on August 15, 2023 at 88 FR 55467; and a 30-day notice on October 24, 2023 at 88 FR 73039, at requesting comments from the public. No comments were received from either of the notices requesting comments.

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

**RESPONSE:** DHS does not provide payments or gifts to respondents in exchange for a benefit sought.

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

**RESPONSE:** There is no assurance of confidentiality provided to the respondents. Consistent with DHS' information sharing mission, all or a portion of the information collection may be disclosed outside DHS consistent with the routine uses set forth in Privacy Impact Assessment, *DHS/ALL/PIA-038, Integrated Security Management System (ISMS)*, and System of Record Notice, *DHS/ALL-023 Department of Homeland Personnel Security Management*, 85 FR 64511 (11/12/2020).

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 person's form whom the information is requested, and any steps to be taken to obtain their consent.

**RESPONSE:** There are no questions of a sensitive nature in this information collection.

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 in Item 13 of OMB Form 83-I.
- 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. Instead, this cost should be included in Item 14.

**RESPONSE:** The methodology used to estimate the annualized cost burden to the respondent for this collection of information includes:

- a. Using wage data obtained from the U.S. Bureau of Labor Statistics (BLS) that is consistent with Department-wide acquisition practices for contracted occupational specialties and services. The national average for the mean hourly wage across all occupations within the federal executive branch, excluding state and local schools and hospitals and the U.S. Postal Service, is \$44.26 ([https://www.bls.gov/oes/current/naics4\\_999100.htm#00-0000](https://www.bls.gov/oes/current/naics4_999100.htm#00-0000)).
- b. Allocating 15 minutes (i.e., 0.25 hrs.) per collection for the respondent to read the instructions provided on the DHS Form 11000-25 and complete only Section II of the form. Section II of DHS Form 11000-25 consists of simple questions to collect certain demographic information about the respondent (e.g., full name, position title, SSN, gender, date and place of birth, U.S. citizenship status, telephone number, and email address).

Type of Respondent	Form Name / Form Number	No. of Respondents	No. of Responses per Respondent	Avg. Burden per Response (in hours)	Total Annual Burden (in hours)	Avg. Hourly Wage Rate	Total Annual Respondent Cost
Member of the Public (i.e., DHS Contractor)	DHS Contractor Fitness/Security Screening Request Form DHS Form	45,000	1	0.25 hrs.	11,250 hrs.	\$44.26	\$497,925

	11000-25						
Total		45,000	1	0.25 hrs.	11,250 hrs.	\$44.26	\$497,925

13. Provide an estimate of the total annual cost burden to respondents or record keepers resulting from the collection of information. (Do not include the cost of any hour burden shown in Items 12 and 14).

- 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. 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.

**RESPONSE:** There are no record keeping, capital, start-up or maintenance costs associated with this information collection.

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. Agencies also may aggregate cost estimates from Items 12, 13, and 14 in a single table.

**RESPONSE:** The Department will use existing resources to support this information

collection. As a result, no new annualized cost will be incurred by the Federal government.

15. Explain the reasons for any program changes or adjustments reporting in Items 13 or 14 of the OMB Form 83-I.

**RESPONSE:** This is a new collection.

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.

**RESPONSE:** This information collection will not be published for statistical purposes.

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.

**RESPONSE:** DHS will display the expiration date for OMB approval of this information collection.

18. Explain each exception to the certification statement identified in Item 19, "Certification for Paperwork Reduction Act Submission," of OMB 83-I.

**RESPONSE:** No exceptions are being submitted to the certification statement on OMB Form 83-I, Item 19 (i.e., "Certification for Paperwork Reduction Act Submission").