SUPPORTING STATEMENT FOR THE ARSON AND EXPLOSIVES TRAINING REGISTRATION FOR NON-ATF EMPLOYEES, ATF FORM 6310.1

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.

The Bureau of Alcohol, Tobacco, Firearms and Explosives (ATF) currently provides arson and explosives techniques training to Federal, State, and local, military, and international law enforcement investigators. The Arson and Explosives Training Registration Request for Non-ATF Employees - ATF Form 6310.1 is completed by prospective students when applying to attend this training. Currently, course descriptions are available on the ATF website. The National Center for Explosives Training and Research (NCETR) staff will process the Registration Request.

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.

ATF Form 6310.1 is used to obtain personally identifiable information (PII) from Federal, State, and local, military, and international law enforcement investigators when applying to attend or requesting information about arson and explosives training provided by ATF. The information provided on the form will determine the applicant's eligibility to attend the training. The respondent must also supply information about their current employment, responsibilities, and duties.

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.

The fillable Arson and Explosives Training Registration Request for Non-ATF Employees - ATF Form 6310.1 is available on the ATF web site. The form must be completed and submitted electronically for processing via email.

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 A.2 above.

The ATF Subject Classification System is used to identify duplication. This system also ensures that any similar information already available cannot be used or modified for this information collection.

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

The collection of this information 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.

The requested information is needed to verify the eligibility of prospective applicants to attend training and to plan future courses.

- 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 statistical data classification that has not been reviewed and approved by OMB;
 - that includes a pledge of confidentially that is not supported by authority established in statute or regulation, that is not supported by disclosure and data

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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 confidentially to the extent permitted by law.

Arson and explosives training courses are offered by ATF on an ongoing basis and candidates may apply at any time. Applicants are required to provide the requested information once for each training session they wish to attend. There are no special circumstances regarding this collection.

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 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.

No comments have been received during the 60-day Federal Register notice period. However, a 30-day notice will be published in the Federal Register to solicit public comments.

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

No payment or gift is associated with this information collection.

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

> The collected information will be available only to ATF personnel at the National Center for Explosives Training and Research, and the candidate's sponsoring agency. Confidentiality is not assured.

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.

The Social Security Number (SSN) is requested from the respondent because ATF provides high-risk and high liability training to law enforcement personnel within the Federal, State, and local government. The risks and liability associated with this training are due to the nature of arson and explosives activities in general, and when conducting responsibilities related to these activities in the workplace. ATF must be able to identify all individuals who attend arson and explosives training, because the skills taught are applied in the workplace and/or provides certification in related expertise. ATF must also be able to identify all training participants in the event of a post-training incident(s) or there is a need defend a law enforcement officer's expertise in court. The SSN is a unique identifier for an individual student who participates in arson and explosives training, regardless of their career with multiple law enforcement agencies. In addition, some of the Bureau's training facilities and programs require partial background checks for clearance purposes.

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. General, estimates should not include burden hours for customary and usual business practices.

ATF estimates that 500 prospective students will apply for arson and explosives training once per year. The total annual response is 500. The estimated time to complete this form is six minutes. Therefore, the total annual burden is 50 hours.

> If this request for approval covers more than one form, provide separate hour burden estimates for each form.

 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.

Estimated Annualized Respondent Cost and Hour Burden

Activity	Number of Respondents	Frequency	Total Annual Responses	Time Per Response	Total Annual Burden (Hours)	Hourl y Rate*	Monetized Value of Respondent Time
ATF F		_					
6310.1	500	1	500	6 min	50		
Unduplicate d Totals							

Hourly rate source citation or you may enter a footnote:

- 13. Provide an estimate of the total annual cost burden to respondents or recordkeepers 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 service 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

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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.

ATF estimates that all applications for arsons and explosives training are e-mailed to ATF for processing. Therefore, there are no public costs associated with this information collection.

14. Provide estimates of the 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), 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 into a single table.

There are no Federal Government costs associated with this information collection.

15. Explain the reasons for any program changes or adjustments.

There are no program changes or adjustments associated with this collection.

16. For collections of information whose results will be published, outline plans for tabulations, 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.

No information collected will be published.

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.

ATF does not require approval not to display the expiration date of OMB approval for this collection.

18. Explain each exception to the certification statement.

There are no exceptions to the certification statement.

B. COLLECTIONS OF INFORMATON EMPLOYING STATISTICAL METHODS.

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This collection of information employs no statistical methods.