

## SUPPORTING STATEMENT - PART A

### National Defense University Security Office Forms – 0704-NDUS

#### Summary of Changes from Previously Approved Collection

- *Revisions to one of two collection instruments to reflect the change in the NBIS system from eQip to eApp: i.e. renamed the form used to conduct background checks from “NDU Nomination for National Agency Check w/ Inquiries Form” to NDU NBIS eApp Nomination Tier One Background Investigation Form.”*
- *Deleted reference to SORN DNDU01 “Student Data Files” as this is not the applicable SORN. Replaced with correct authorities for PII collection.*
- *Removed the reference to the SSN Justification Memo. NDU’s SSN Justification Memo is for students only. Employee PII is collected under a different authority investigations (see above bullet).*
- *The Respondent wage rate was updated to reflect OPM’s 2024 wage scale.*

#### 1. Need for the Information Collection

The National Defense University (NDU) is an internationally recognized graduate-level university with five colleges and multiple centers of excellence focused on education, research, and outreach in national security matters. With campuses at Ft. McNair, Washington, DC, Norfolk, Virginia, and Ft. Liberty, North Carolina, NDU is a worldwide entity with reach and influence extending throughout the U.S. and international community. To execute NDU’s mission, a selection of individuals (military, civilians, contractors, and foreign partners) are assigned to the colleges and centers within NDU’s area of responsibility to facilitate Joint Professional Military Education to U.S. military components, Department of Defense civilian force, and international community.

The NDU Security Office is responsible for ensuring personnel and facility security in all situations involving NDU employees comprising: Faculty, staff, contractors and interns (unpaid, volunteers also known as “Student Trainees”). This includes ensuring that an appropriate background investigation is completed and favorably adjudicated in accordance with 32 CFR § 156.6 - Common Access Card (CAC) investigation and adjudication. The NDU Security Office is also responsible for in-processing all permanent personnel, including contractors, and foreign partners assigned to the colleges and centers. In accordance with Homeland Security Presidential Directive (HSPD)-12 and Federal Information Processing Standards (FIPS) 201, data provided is necessary to process Personal Identity Verification (PIV) credentials to personnel seeking physical access to federally-controlled government facilities.

The authority by which to collect this information is 10 U.S.C. 2163, Degree Granting Authority for National Defense University. The authority for soliciting and verifying your SSN is Executive Order 9397, as amended by EO 13478. The DoD-wide authority for collecting this information is Personnel Vetting Records System, DUSDI 02-DoD (October 17, 2018; 83 FR 52420).

#### 2. Use of the Information

Respondents to this collection provide information to the NDU Security Office on two forms as follows:

1. NDU NBIS eApp Nomination Tier One Background Investigation Form: Student Trainees (unpaid volunteers) and contractors. Includes information necessary to complete a background investigation for Common Access Card (CAC) issuance.
2. NDU Security In-Process Form: new employees and contractors. Includes information for in-processing and PIV credentialing.

The forms are provided in pencil-and-paper format and submitted physically to the appropriate NDU Security Office personnel. The NDU Personnel Security team (PERSEC) then verifies that the inbound person has the correct security clearance and need to know for their intended role at NDU, and has the information required to process the individual for a CAC card and NDU badge.

NBIS eApp Tier One Background Investigation is the minimum background investigation required to meet HSPD-12 requirements for CAC issuance to individuals entrusted with access to Federal property, information systems, and any other information bearing on national security. The Form may be used as the basis for future investigation submission via the National Background Investigation Services (NBIS) eApp (electronic application) used by the Defense Counterintelligence and Security Agency (DCSA). Without the information collected on this form, NDU would be unable to initiate the background investigation process to ensure Federal security, suitability, fitness, and credentialing of its new hire employees and partners.

The NDU Security In-Processing Form is needed to solicit information that will facilitate the processing of PIV credentials for personnel requiring physical access to NDU. The NDU Security In-Processing Form is used to solicit information on NDU new hire civilian employees and or contractors who have no prior government/DoD employment history. NDU Security In-Processing Form is used for vetting and verification of an employee or contractors background investigation within Defense Information System for Security (DISS), DCSA Central Verification System (CVS), and Intelligence Community (IC) database Scattered Castles.

### 3. Use of Information Technology

Both collection instruments are included in this package. Forms are provided to Respondents electronically to complete. NDU Security offers the Security In-Process Request Form in electronic formats on NDU's SharePoint website so that responses can be submitted and processed 100% electronically.

### 4. Non-duplication

The information obtained through this collection is unique and is not already available for use or adaptation from another cleared source.

5. Burden on Small Businesses

This information collection does not impose a significant economic impact on a substantial number of small businesses or entities.

6. Less Frequent Collection

The standard for collection of data will be at the minimum amount necessary and appropriate. If information is not collected on an as-needed basis, NDU will not be able to initiate, process, and complete these essential functions in the timely manner that is necessary to ensure personnel, facility, and information security. It could also affect NDU employees' ability to conduct their essential duties.

7. Paperwork Reduction Act Guidelines

This collection of information does not require collection to be conducted in a manner inconsistent with the guidelines delineated in 5 CFR 1320.5(d)(2).

8. Consultation and Public Comments

Part A: PUBLIC NOTICE

A 60-Day Federal Register Notice (FRN) for the collection published on Tuesday, July 9, 2024. The 60-Day FRN citation is 85 FR 81457.

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

A 30-Day Federal Register Notice for the collection published on Friday, November 8, 2024. The 30-Day FRN citation is 89 FR 88747.

Part B: CONSULTATION

No additional consultation apart from soliciting public comments through the Federal Register was conducted for this submission.

9. Gifts or Payment

No payments or gifts are being offered to respondents as an incentive to participate in the collection.

10. Confidentiality

A Privacy Act Statement is required for this collection because we are requesting individuals to furnish personal information for a hard copy form system of records maintained by the security office. Privacy Act Statements are provided at the bottom of all both forms.

The approved Privacy Impact Assessment (PIA) associated with this collection, "National Defense University (NDU) Enterprise Information System (NEIS)" is provided with the package.

Records retention and disposition is covered by CJCSM 5760.01A, Vol. II, "Joint Staff and Combatant Command Disposition Schedule," dated 13 July 2012, incorporating Schedule DAA-0218-2019-0002, "Academic Affairs," dated 22 June 2020.

11. Sensitive Questions

Respondents' SSNs are collected on both forms. The authority for soliciting and verifying SSNs is Executive Order 9397, as amended by EO 13478. No other questions considered sensitive are being asked in this collection.

12. Respondent Burden and its Labor Costs

Part A: ESTIMATION OF RESPONDENT BURDEN

1) Collection Instruments

NDU NBIS eApp Nomination Tier One Background Investigation Form

- a) Number of Respondents: 100
- b) Number of Responses Per Respondent: 1
- c) Number of Total Annual Responses: 100
- d) Response Time: 10 minutes
- e) Respondent Burden Hours: 16.67 hours

NDU Security In-Process Form

- a) Number of Respondents: 125
- b) Number of Responses Per Respondent: 1
- c) Number of Total Annual Responses: 125
- d) Response Time: 13 minutes
- e) Respondent Burden Hours: 27.08 hours

2) Total Submission Burden (Summation or average based on collection)

- a) Total Number of Respondents: 225
- b) Total Number of Annual Responses: 225
- c) Total Respondent Burden Hours: 44 hours

Part B: LABOR COST OF RESPONDENT BURDEN

1) Collection Instruments

NDU NBIS eApp Nomination Tier One Background Investigation Form

- a) Number of Total Annual Responses: 100
- b) Response Time: 10 minutes
- c) Respondent Hourly Wage: \$19.33
- d) Labor Burden per Response: \$3.22
- e) Total Labor Burden: \$322

NDU Security In-Process Form

- a) Number of Total Annual Responses: 125
- b) Response Time: 15 minutes
- c) Respondent Hourly Wage: \$19.33
- d) Labor Burden per Response: \$4.83
- e) Total Labor Burden: \$603.75

2) Overall Labor Burden

- a) Total Number of Annual Responses: 225
- b) Total Labor Burden: \$925.75

The most common respondents are NDU Interns. The Respondent hourly wage was determined by using the 2024 Office of Personnel Management GS pay-scale for GS-4, step 1 for the Washington, D.C. locality pay area.

13. Respondent Costs Other Than Burden Hour Costs

There are no annualized costs to respondents other than the labor burden costs addressed in Section 12 of this document to complete this collection.

14. Cost to the Federal Government

Part A: LABOR COST TO THE FEDERAL GOVERNMENT

1) Collection Instruments

NDU NBIS eApp Nomination Tier One Background Investigation Form

- a) Number of Total Annual Responses: 100
- b) Processing Time per Response: 10 minutes
- c) Hourly Wage of Worker(s) Processing Responses: \$47.53
- d) Cost to Process Each Response: \$7.92
- e) Total Cost to Process Responses: \$792

NDU Security In-Process Form

- a) Number of Total Annual Responses: 125
- b) Processing Time per Response: 15 minutes
- c) Hourly Wage of Worker(s) Processing Responses: \$47.53
- d) Cost to Process Each Response: \$1.88
- e) Total Cost to Process Responses: \$1,485

- 2) Overall Labor Burden to the Federal Government
  - a) Total Number of Annual Responses: 225
  - b) Total Labor Burden: \$2,277

Part B: OPERATIONAL AND MAINTENANCE COSTS

- 1) Cost Categories
  - a) Equipment: \$2,200
  - b) Printing: \$0
  - c) Postage: \$0
  - d) Software Purchases: \$62.83
  - e) Licensing Costs: \$0
  - f) Other: \$0
  
- 2) Total Operational and Maintenance Cost: \$2,263

Part C: TOTAL COST TO THE FEDERAL GOVERNMENT

- 1) Total Labor Cost to the Federal Government: \$2,277
- 2) Total Operational and Maintenance Costs: \$2,263
- 3) Total Cost to the Federal Government: \$4,540

15. Reasons for Change in Burden

The overall burden cost to the respondents has increased due to recalculating 2024 payscales.

16. Publication of Results

The results of this information collection will not be published.

17. Non-Display of OMB Expiration Date

We are not seeking approval to omit the display of the expiration date of the OMB approval on the collection instrument.

18. Exceptions to "Certification for Paperwork Reduction Submissions"

We are not requesting any exemptions to the provisions stated in 5 CFR 1320.9.