

SUPPORTING STATEMENT - PART A

Exchange Security Verification for Contractors/Vendors – 0702-0135

1. Need for the Information Collection

The Secretary of Defense has vested in the Secretary of the Army and the Secretary of the Air Force all functions, powers, and duties relating to Army and Air Force Exchange Service (the Exchange) activities within their respective military departments. This authority is held jointly and equally. Army Regulation 215-8/Air Force Instruction 34-211(I), “Army and Air Force Exchange Service Operations,” charges the Exchange with the dual and enduring mission of providing quality merchandise and services to its customers at competitively low prices and of generating earnings which provide a dividend to support family, morale, welfare, and recreation (FMWR) programs.

The prescribing directives, which govern the security investigations and clearances of assigned Exchange contractors and vendors, as well as employees, are DoDI 5200.01, “DoD Information Security Program and Protection of Sensitive Compartmented Information,” and DoDI 5200.02, “DoD Personnel Security Program (PSP).”

Additionally, security procedures are in compliance with the following authorities:

- Executive Order (EO) 13526 – “Classified National Security Information”
- EO 10450 – “Security Requirements for Government Employment”
- AR 380-67 – “Personnel Security Program”
- AFI16-1405 – “Air Force Personnel Security Program”
- AFI16-1404 – “Information Security Program Management”

The Exchange Director/Chief Executive Officer (CEO) has the authority to identify security clearance jurisdiction over the Exchange Headquarters (HQ) and its subordinate activities.

The Exchange retail mission requires timely delivery of products and services to military service members with the assistance of vendors and contractors. Information collected to facilitate the initiation, investigation, and adjudication of information relative to DoD security clearance for these contractors and vendors.

After an Exchange contract has been awarded, prior to performing or conducting any approved contractual work on any federal installation, the contractor/vendor shall comply with the local installation’s personal identity verification procedures, mandated by Homeland Security Presidential Directive (HSPD)-12 (<http://www.dhs.gov/homelandsecurity-presidential-directive-12>).

2. Use of the Information

After the Exchange awards a contract, the awarded contractors/vendors must complete and submit a security pre-screening packet via the Exchange Resource Onboarding

Application (ROBA), which prepopulates the requested Exchange security forms significantly decreasing the respondent's burden. When the collection is completed through ROBA, the contractor/vendor accesses the system with a temporary ID and password obtained by email from the Exchange Resource Administrator (RA). After input, pre-screening is conducted to ensure that potential Exchange contractors can pass a preliminary background check. This reduces the overall cost burden for the Exchange, eliminating a large subset of contractors who will not pass a normal background investigation. The inception and utilization of ROBA allows contractors/vendors a single electronic input of his/her data resulting in a rapid population of the manual forms identified below. ROBA reduces redundancy of information, minimizes errors, and decreases the respondent's processing time.

After completion of the initial collection of data, appointments for delivering security packages and the required fingerprints can be scheduled through ROBA. If the contractor/vendor is unable to appear in person, the security package must include a completed fingerprint card certified and presented on either the United States, Department of Justice, Federal Bureau of Investigation Form FD-258, "Applicant Fingerprint Card," or Standard Form (SF) 87, "Fingerprint Card."

Manual forms are provided when the contractor/vendor cannot access ROBA, such as when they will be working in overseas locations or due to technical limitations. When the information is completed manually, the RA provides the contractor/vendor directions on what must be included within their security package, including which forms are required, how to complete the forms, and what other documents must be presented as supplemental material. Once completed, the contractor/vendor must either hand deliver or mail (with tracking number) the packet back to the RA. (Note: the following forms listed below will not be required if the contractor/vendor has access to ROBA.) The manual exchange forms are:

Exchange Form 3900-002 (Trusted Associate Sponsorship System)

The Exchange contractor/vendor obtains a Common Access Card (CAC) to gain access to Exchange facilities that are located on military installations. An Exchange Trusted Agent for the Trusted Associate Sponsorship System (TASS), a system owned and controlled by the Defense Manpower Data Center, utilizes the information collected on the Exchange Form 3900-002 to input into TASS. Input into this system allows the contractor/vendor to be sponsored in the Defense Enrollment and Eligibility Reporting Systems (DEERS), which is required for CAC authorization.

Exchange Form 3900-006 (Background Check for Facility Access)

This form is required when a contractor/vendor requires Exchange facility access. Form 3900-006 must be completed prior to meeting with Force Protection or must be included within the contractor/vendor submission of the security package.

Exchange Form 3900-013 (Request for e-QIP Access)

Information collected on Exchange Form 3900-013 is used by Exchange Force Protection to facilitate the pre-screening selection process and contractor/vendor access into the Defense Counterintelligence and Security Agency (DCSA) Electronic Questionnaires for Investigative Processing (e-QIP).

The initiation of federal investigations for contractors/vendors and Exchange associates requires extra efforts to support their work responsibilities. The option of childcare checks, deployment, firearms and other situations are shown on Exchange Form 3900-013. Contractors/vendors or Exchange associates that will be working with or around children under the age of eighteen are required to have childcare background clearance/checks included within their investigations in accordance with the Crime Control Act of 1990 (Public Law 101-647). The extra coverage for childcare is required to be coded in the e-QIP system to ensure that DCSA conducts the appropriate investigation.

The Exchange upholds Bureau of Alcohol, Tobacco, Firearms, and Explosives (ATF) corporate and installation regulatory compliance of inherently dangerous inventory while safeguarding the community. The Exchange's Firearms Sales Program emphasizes compliance perfection to prevent federal, state and installation incidents and investigations. Support and participation by management and associates at all levels are required to make this program successful.

For the manual process, the RA will then make an appointment with the Exchange HQ Force Protection Directorate to complete the contractor/vendor fingerprinting requirements. If the contractor/vendor is unable to appear in person, the security packet must contain a completed fingerprint card certified by a reliable source as identified earlier in this statement.

Once all collected information is obtained, analyzed, and approved, Exchange Force Protection inputs the necessary data into the e-QIP system to process the SF 85, "Questionnaire for Non-Sensitive Positions," and/or the SF 86, "Questionnaire for National Security Positions," which begins the investigative process. Once the RA reviews the e-QIP for completeness and errors, the contractor/vendor will then log into the form to affirm all their answers and responses.

3. Use of Information Technology

Ninety-eight (98%) percent of the information is collected electronically. Utilization of the web-based ROBA significantly eliminates redundancies and decreases burden.

Paper applications received are expedited and vetted manually. Enhancements to accommodate unique business needs is still under development.

4. Non-Duplication

Non-Appropriated Fund Instrumentalities require usage of different forms that have slight variations from DoD forms in collecting information from its contractors, associates, and vendors for procurement and jurisdiction. Information collected in this system may vary slightly and contain less or more data inquiries than that from other approved collection instruments such as the Joint Personnel Adjudication System (JPAS) or e-QIP. The Exchange collects information from contractors/vendors on the listed collection instruments identified in Section 2 of this statement to aid in pre-screening of contractors/vendors for credentialing through official Federal investigations.

5. Burden on Small Business

One Hundred (100%) percent of data collected comes from small businesses. The Exchange collects the minimum necessary for personal identification verification and background checks to ensure the security of buildings and resources. All efforts have been taken to decrease the burden through electronic submission. Burden on small businesses cannot be further reduced without endangering the United States common defense and national security.

6. Less Frequent Collection

Information is voluntarily provided for security/background checks for the purposes addressed in this statement. The information collection is completed on occasion at the time when a contractor/vendor desires to obtain a business relationship with the Exchange and/or is chosen as the winner of a contract. Less frequent collection is not possible.

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 Title 5 CFR 1320.5(d) (2).

8. Consultation and Public Comments

Part A: PUBLIC NOTICE

A 60-Day Federal Register Notice of the collection published on Monday, April 25, 2022. The 60-Day FRN citation is 87 FR 24285.

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

A 30-Day Federal register Notice of the collection published on Tuesday, October 25, 2022. The 30-Day FRN citation is 87 FR 64457.

Part B: CONSULTATION

The Exchange Force Protection provided significant input and information in relation to the continued use and burden relative to this collection of information. It was determined that information is only maintained in one database and used accordingly as outlined in section 2 of this statement.

9. Gifts or Payment

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

10. Confidentiality

The information collected and maintained in this system is protected under the Privacy Act of 1974, as amended. Respondents are assured confidentiality through the Privacy Act Statement(s) available for reading on the applicable collection documents.

The currently published AAFES SORN 1703.03, "Personnel Security Clearance Case Files," can be accessed at <https://pclt.defense.gov/DIRECTORATES/Privacy-and-Civil-Liberties-Directorate/Privacy/SORNsIndex/Article/4013470/aafes-170303/>. A draft copy of the modified SORN has also been provided with this package for OMB's review.

The Privacy Impact Assessment (PIA) for the Exchange Security Clearance Case System is currently being revised. A draft copy has been provided with this package for OMB's review.

Consistent with the General Records Schedule 5.6, "Security Records" (DAA-GRS-2017-0006-0024), security files for contractors and vendors not issued clearances are destroyed by shredding or erased from the server one year after consideration and, for those issued clearances, five years after their contract relationship with the AAFES expires. Longer retention is authorized if required for business use.

11. Sensitive Questions

The Exchange is required by United States Presidential Executive Orders and federal law to protect federal government assets including citizens, federal property, and Automated Information Systems (AIS) as well as placing individuals in a position of trust for handling of classified information and prevention of terroristic activities. In accordance with the above listed authorities, respondents may be asked to provide Social Security Number (SSN), date of birth, sex, nationality, color or hair and eyes, and weight. Collection of social security number is authorized under DoDI 1000.30, "Reduction of Social Security Number (SSN) Use Within the DoD," Enclosure 2, sections 2.c.(2), (3), (4), (5), (8) and (9) as represented on the SSN Memorandum.

12. Respondent Burden, and its Labor Costs

Part A: ESTIMATION OF RESPONDENT BURDEN

1) Collection Instruments

Resource Onboarding Application System (ROBA)

- a) Number of Respondents: 2,834
- b) Number of Respondents Per Respondent: 1
- c) Number of Total Annual Responses: 2834
- d) Response Time: 30 Minutes
- e) Respondent Burden Hours: 1,417 Hours

Exchange Form 3900-002 – Trusted Associate Sponsorship Systems (TASS)

- a) Number of Respondents: 22
- b) Number of Respondents Per Respondent: 1
- c) Number of Total Annual Responses: 22
- d) Response Time: 30 Minutes
- e) Respondent Burden Hours: 11 Hours

Exchange Form 3900-006 – Background Check for Facility Access

- a) Number of Respondents: 22
- b) Number of Respondents Per Respondent: 1
- c) Number of Total Annual Responses: 22
- d) Response Time: 30 Minutes
- e) Respondent Burden Hours: 11 Hours

Exchange Form 3900-013 – e-QIP Request Form

- a) Number of Respondents: 22
- b) Number of Respondents Per Respondent: 1
- c) Number of Total Annual Responses: 22
- d) Response Time: 30 Minutes
- e) Respondent Burden Hours: 11 Hours

2) Total Submission Burden

- a) Total Number of Respondents: 2,900
- b) Total Number of Annual Responses: 2,900
- c) Total Respondent Burden Hours: 1,450 Hours

Part B: LABOR COST OF RESPONDENT BURDEN

1) Collection Instruments

Resource Onboarding Application System (ROBA)

- a) Number of Total Annual Responses: 2,834
- b) Response Time: 30 Minutes (.5 Hour)
- c) Respondent Hourly Wage: \$15.00
- d) Labor Burden Per Response: \$7.50
- e) Total Labor Burden: \$21,255.00

Exchange Form 3900-002 – Trusted Associate Sponsorship Systems (TASS)

- a) Number of Total Annual Responses: 22
- b) Response Time: 30 Minutes
- c) Respondent Hourly Wage: \$15.00
- d) Labor Burden Per Response: \$7.50
- e) Total Labor Burden: \$165.00

Exchange Form 3900-006 – Background Check for Facility Access

- a) Number of Total Annual Responses: 22
- b) Response Time: 30 Minutes
- c) Respondent Hourly Wage: \$15.00
- d) Labor Burden Per Response: \$7.50
- e) Total Labor Burden: \$165.00

Exchange Form 3900-013 – e-QIP Request Form

- a) Number of Total Annual Responses: 22
- b) Response Time: 30 Minutes
- c) Respondent Hourly Wage: \$15.00
- d) Labor Burden Per Response: \$7.50
- e) Total Labor Burden: \$165.00

2) Overall Labor Burden

- a) Total Number of Annual Responses: 2,900
- b) Total Labor Burden: \$21,750.00

The respondent hourly wage was determined using the federal contractor minimum wage rate effective on January 1, 2022, in accordance with the final rule implementation of Executive Order 14026, signed on April 26, 2021. The United States Department of Labor Fact Sheet regarding this increase is available for view at <https://www.dol.gov/sites/dolgov/files/WHD/fact-sheets/whdfs83b.pdf>.

13. Respondent Costs Other Than Burden Hour Costs

In accordance with HSPD-12, contractors/vendors who elect to mail their security package to EG-FP will be responsible for paying the applicable postage fees.

14. Cost to the Federal Government

Part A: LABOR COST TO THE FEDERAL GOVERNMENT

1) Collection Instruments

Resource Onboarding Application System (ROBA)

- a) Number of Total Annual Responses: 2,834
- b) Processing Time per Response: .5 / Hour (30 Minutes)
- c) Hourly Wage of Worker(s) Processing Responses: \$25.20
- d) Cost to Process Each Response: \$12.60
- e) Total Labor Burden: \$35,708.40

Exchange Form 3900-002 – Trusted Associate Sponsorship Systems (TASS)

- a) Number of Total Annual Responses: 22
- b) Processing Time per Response: .17 / Hour (10 Minutes)
- c) Hourly Wage of Worker(s) Processing Responses: \$25.20
- d) Cost to Process Each Response: \$4.28
- e) Total Cost to Process Responses: \$94.25

Exchange Form 3900-006 – Background Check for Facility Access

- a) Number of Total Annual Responses: 22
- b) Processing Time per Response: .17 / Hour (10 Minutes)
- c) Hourly Wage of Worker(s) Processing Responses: \$25.20
- d) Cost to Process Each Response: \$4.28
- e) Total Cost to Process Responses: \$94.25

Exchange Form 3900-013 – e-QIP Request Form

- a) Number of Total Annual Responses: 22
- b) Processing Time per Response: .17 / Hour (10 Minutes)
- c) Hourly Wage of Worker(s) Processing Responses: \$25.20
- d) Cost to Process Each Response: \$4.28
- e) Total Cost to Process Responses: \$94.25

2) Overall Labor Burden to Federal Government

- a) Total Number of Annual Responses: 2,900
- b) Total Labor Burden: \$35,991.14

The hourly wage of workers was determined by using an average mid-point for individuals paid at the NF Pay Band 3 level as displayed in the Defense Civilian Personnel Advisory Service (DCPAS) March 14, 2022, 152 DFW Pay Band Schedule 036-57 listed at <https://wageandsalary.dcpas.osd.mil/Content/NAF%20Schedules/survey-sch/152/152-036-57-NF.pdf>.

Part B: OPERATIONAL AND MAINTENANCE COSTS

1) Cost Categories

- a) Equipment: \$8,175
- b) Printing: \$235
- c) Postage: \$76
- d) Software Purchases: \$6,548 (Depreciation)
- e) Licensing Costs: \$0
- f) Other: \$4,807 (Fingerprinting Yearly Cost)
\$191,950 (ROBA IT Support)

2) Total Operational and Maintenance Cost: \$211,791

Part C: TOTAL COST TO THE FEDERAL GOVERNMENT

- 1) Total Operational and Maintenance Costs: \$211,791.00
- 2) Total Labor Cost to the Federal Government: \$35,991.14
- 3) Total Cost to the Federal Government: \$247,782

15. Reasons for Change in Burden

The respondent burden has increased since the previous approval due to the Executive Order implementation of a \$15.00 minimum wage for federal contractors. The overall cost to the Federal Government has decreased due to the elimination of system development expenses.

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.