

SUPPORTING STATEMENT - PART A

Specific Authorization for Disclosure of Financial Information (DCSA 343) and Specific Authorization for Release of Behavioral Health and Related Medical Information (DCSA 344)

OMB #0705-SARD

1. Need for the Information Collection

The information collected on the Specific Authorization for Disclosure of Financial Information (DCSA 343) and Specific Authorization for Release of Behavioral Health and Related Medical Information (DCSA 344) is used for Federal and Federal contract employment. The DCSA 343 is a special consent form that will allow the Defense Counterintelligence and Security Agency (DCSA) access to certain financial records which are not otherwise accessible because they are protected under the provisions of the Right to Financial Privacy Act. The DCSA 344 is a special consent form that will allow the DCSA access to certain restricted medical records which are not otherwise accessible because they are protected under the Health Insurance Portability and Accountability Act (HIPAA).

Solicitation of the information, including the Social Security number, is authorized pursuant to Section 925 of Public Law 115-91; and Executive Order 13467 as amended by Executive Order 13869.

The Defense Counterintelligence and Security Agency (DCSA) is authorized to collect the information.

2. Use of the Information

DCSA's use of the 343 and 344 will be limited to background investigations, conducted under the aforementioned authorities, requiring a deeper review of an individual's personal finances or sensitive medical information, strictly limited to the circumstances defined within and required by the Federal Personnel Vetting Investigative Standards.

The information collected on the Specific Authorization for Disclosure of Financial Information (DCSA 343) will be used to obtain specific financial information where there is evidence of financial concerns. The DCSA 343 will be used in background investigations to help establish facts required to determine whether the subject of the investigation should be adjudicated to be eligible for logical and physical access to Government facilities and systems; suitable or fit for Federal employment; fit to perform work on behalf of the Federal Government under a Government contract; eligible to hold a position that is sensitive for national security reasons; or eligible for access to classified information. The DCSA 343 will only be used when information is unable to be obtained solely with the use of the Standard Form (SF) *Authorization for Release of Information*.

The information collected on the Specific Authorization for Release of Behavioral Health and Related Medical Information (DCSA 344) will be used to conduct a detailed medical interview and record review with the practitioner when the practitioner indicates on the *SF Authorization for Release of Medical Information Pursuant to the HIPAA* that the subject of the investigation has a condition or treatment that could impair judgement, reliability, or trustworthiness; there is evidence of alcohol-related treatment or counseling; or there is evidence of drug-related treatment or counseling. The DCSA 344 will be used in background investigations to help establish facts required to determine whether the subject of the investigation should be adjudicated to be eligible for logical and physical access to Government facilities and systems; suitable or fit for Federal employment; fit to perform work on behalf of the Federal Government under a Government contract; eligible to hold a position that is sensitive for national security reasons; or eligible for access to classified information. The DCSA 344 will only be used when one or more of the aforementioned criteria are met.

DCSA background investigators will provide the DCSA 343 and/or 344, in applicable situations as described above, directly to respondents during an interview session; and will explain the purpose. Most often, respondents will complete the applicable collection instrument hardcopy and hand it back to the background investigator during the interview session; however, it is possible the DCSA 343 and/or 344 may be sent electronically via DoD SAFE (secure access file exchange) to the respondent as a fillable PDF after the interview session. If sent electronically, the respondent may complete the PDF electronically or print and complete it hardcopy, then returned via the DoD SAFE to the background investigator.

The completed collection instrument is utilized by the background investigator to conduct the focused investigative check with the specific medical or financial entity identified on the collection. A copy of the completed collection instrument is provided to the specific record source (e.g., the named medical or financial entity); and it is also maintained by DCSA as part of the subject's background investigative record.

3. Use of Information Technology

The DCSA 343 and 344 collection instruments will most likely be completed in person, hardcopy, in the presence of a DCSA background investigator due to the sensitivity of the investigative matter they pertain to. In the rare instance when the DCSA 343 and/or 344 cannot be collected in person, DoD SAFE will be utilized to send the collection instrument and receive it back from the respondent. Electronic collection is estimated to occur 5% of the time and would be for situations when it is not possible for the investigator and subject to meet in person. These collection methods align with current investigative techniques and procedures.

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

DCSA's use of these collections will be limited to background investigations requiring a deeper review of an investigative subject's personal finances or sensitive medical information. Use of these collections is strictly limited to the circumstances defined within and as required by the Federal Personnel Vetting Investigative Standards; and DCSA's ability to conduct these investigative checks would be compromised absent the use of the DCSA 343 and 344.

Neither the DCSA 343 or 344 will be used for any purpose other than personnel background investigations, as described above.

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) or other policy.

8. Consultation and Public Comments

Part A: PUBLIC NOTICE

A 60-Day Federal Register Notice (FRN) for the collection published on Tuesday, September 2nd, 2025. The 60-Day FRN citation is 90 FR 42399.

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

A 30-Day Federal Register Notice for the collection published on Tuesday, December 16, 2025. The 30-Day FRN citation is 90 FR 58236.

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

The DCSA 343 and DCSA 344 includes a Privacy Act Statement on the top of each form. The statement indicates that the forms are in full compliance with 5 U.S.C. 552a (the Privacy Act of 1974) and other laws protecting the rights of the respondent. Further, the forms note that the information provided by the respondent, as well as any information collected

including the identity of the record provider, may be disclosed to the respondent upon request unless otherwise exempt.

The DCSA 343 and DCSA 344 are covered by the DUSDI-02 – Personnel Vetting Records System SORN:

<https://www.federalregister.gov/documents/2018/10/17/2018-22508/privacy-act-of-1974-system-of-records>

The completed DCSA 343 and DCSA 344 will be maintained in an IT system that does require a Privacy Impact Assessment (PIA). The applicable PIA for the OPIS Imaging System was finalized 7/7/2025 and is published on DCSA's public-facing website:

<https://www.dcsa.mil/OPIS-PIA.pdf>.

The applicable Records Retention and Disposition Schedules is: DAA-0446-2019-0004.

11. Sensitive Questions

A SSN Justification Memo (SSNJM), signed by DCSA's Chief Privacy Officer, is included in the package for this collection. It details the applicable Acceptable Use in accordance with DoDI 100.30, which is *Acceptable Use Case 2.c.(3): Security Clearance Investigation or Verification*.

The DoD ID (EDI-PI) is not an adequate or appropriate substitute for the SSN. Not all investigation data subjects are DoD affiliated, the DoD ID is not an identifier used by financial entities or medical providers, and records are not stored or retrieved within DCSA or customer agency personnel vetting IT systems by the DoD ID number.

DCSA Privacy will forward the SSMJM to the Office of the Assistant to the Secretary of Defense for Privacy, Civil Liberties, and Transparency for further review and processing.

12. Respondent Burden and its Labor Costs

Part A: ESTIMATION OF RESPONDENT BURDEN

1) Collection Instrument(s)

Specific Authorization for Disclosure of Financial Information (DCSA 343)

- a) Number of Respondents: 288
- b) Number of Responses Per Respondent: 1
- c) Number of Total Annual Responses: 288
- d) Response Time: 5 minutes
- e) Respondent Burden Hours: 24 hours

Specific Authorization for Release of Behavioral Health and Related Medical Information (DCSA 344)

- a) Number of Respondents: 3,275
- b) Number of Responses Per Respondent: 1
- c) Number of Total Annual Responses: 3,275

- d) Response Time: 5 minutes
 - e) Respondent Burden Hours: 273 hours
- 2) Total Submission Burden (Summation or average based on collection)
- a) Total Number of Respondents: 3,563
 - b) Total Number of Annual Responses: 3,563
 - c) Total Respondent Burden Hours: 297 hours

Part B: LABOR COST OF RESPONDENT BURDEN

- 1) Collection Instrument(s)
- Specific Authorization for Disclosure of Financial Information (DCSA 343)
- a) Number of Total Annual Responses: 288
 - b) Response Time: 5 minutes
 - c) Respondent Hourly Wage: \$61.03
 - d) Labor Burden per Response: \$5.09
 - e) Total Labor Burden: \$1,465

Specific Authorization for Release of Behavioral Health and Related Medical Information (DCSA 344)

- a) Number of Total Annual Responses: 3,275
 - b) Response Time: 5 minutes
 - c) Respondent Hourly Wage: \$61.03
 - d) Labor Burden per Response: \$5.09
 - e) Total Labor Burden: \$16,656
- 2) Overall Labor Burden
- a) Total Number of Annual Responses: 3,563
 - b) Total Labor Burden: \$18,121

The Respondent hourly wage was determined by using the BLS-estimated average hourly wage Data Entry and Information Processing Workers (Occupation Code 43-9020):

https://www.bls.gov/oes/current/oes_nat.htm

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 Instrument(s)
- Specific Authorization for Disclosure of Financial Information (DCSA 343)
- a) Number of Total Annual Responses: 288
 - b) Processing Time per Response: 5 minutes

- c) Hourly Wage of Worker(s) Processing Responses: \$35.55
- d) Cost to Process Each Response: \$2.84
- e) Total Cost to Process Responses: \$819.07

Specific Authorization for Release of Behavioral Health and Related Medical Information (DCSA 344)

- a) Number of Total Annual Responses: 3,275
- b) Processing Time per Response: 5 minutes
- c) Hourly Wage of Worker(s) Processing Responses: \$35.55
- d) Cost to Process Each Response: \$2.84
- e) Total Cost to Process Responses: \$9,314.10

- 2) Overall Labor Burden to the Federal Government
 - a) Total Number of Annual Responses: 3,563
 - b) Total Labor Burden: \$10,133.17

Part B: OPERATIONAL AND MAINTENANCE COSTS

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

Part C: TOTAL COST TO THE FEDERAL GOVERNMENT

- 1) Total Labor Cost to the Federal Government: \$10,133.17
- 2) Total Operational and Maintenance Costs: \$0
- 3) Total Cost to the Federal Government: \$10,133

15. Reasons for Change in Burden

This is a new collection with a new associated burden.

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.