

Department of Justice
Bureau of Alcohol, Tobacco, Firearms, and Explosives (ATF)
Information Collection Request (ICR)
1140-0123
Personal Identity Verification Form (ATF Form 8620.40)

SUPPORTING STATEMENT

A. JUSTIFICATION

1. Explain the circumstances that make the information collection necessary.

Pursuant to the Memorandum of Understanding (MOU) between the Bureau of Alcohol, Tobacco, Firearms, and Explosives (ATF) and the Office of Personnel Management (OPM), dated March 3, 2000, ATF is authorized to conduct personnel security and suitability background investigations and periodic reinvestigations. Investigations are conducted on applicants and employees in competitive service positions, as well as candidates, contractors, task force officers (TFOs), or volunteers/interns in ATF service provider positions. All personnel security investigations are conducted in accordance with the Intelligence Reform and Terrorism Prevention Act of 2004, 5 CFR part 736, Homeland Security Presidential Directive – 12 (HSPD-12), Trusted Workforce 2.0, corresponding Federal Investigative Standards, and Executive Orders 13467 and 13764.

ATF recruits individuals for placement into full-time equivalent Federal positions and solicits individuals through the Federal acquisition process to fill non-ATF personnel (contractors, TFOs, and volunteers/interns) positions. Candidates who are tentatively selected for positions must meet Federal, Department of Justice, and ATF basic qualification requirements, before they may be granted access to ATF information, information technology (IT) systems, and/or unescorted access to ATF facilities. Individuals will not be granted access if they fail to comply with these requirements and receive an unfavorable adjudication of their background investigation and/or polygraph examination (special agent applicants only). An initial step in these qualification and background check processes is verifying the candidate's identity and citizenship by checking two forms of identification, as required by HSPD-12.

2. Indicate how, by whom, and for what purpose the information is to be used.

An ATF employee or service provider authorized to conduct an in-person review of a candidate's identifying documents uses ATF Form 8620.40, Personal Identity Verification Form, to record the identification documents and the results of the review. The ATF representative reviews two forms of identification presented by the candidate (respondent) and documents their identifying information on the form. This information will be used to begin the eligibility determination process for granting a candidate access to ATF information, IT systems, and/or unescorted access to ATF facilities.

3. Describe whether, and to what extent, the information collection involves using 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.

Respondents who provide information under this information collection do not have to fill out the form. However, the candidates must appear in person in order for ATF personnel to verify that the identifying documents are valid and genuine and match the person. There is no sufficient electronic substitute for this aspect of the process at this time.

4. Describe efforts to identify duplication.

This information is not duplicative and involves a specific situation in which the person's identity and citizenship must be verified. Because of fraud, previous incidents in which a person with the candidate's name has provided identification documents cannot be used to verify their identity and citizenship in this incidence. In addition, ATF uses a uniform subject classification system for forms to identify duplication and to ensure that any similar information already available cannot be used or modified for use for the purpose of this information collection.

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

This collection of information does not have a significant impact on small entities. It pertains to federal employees, not businesses.

6. Describe the consequence to federal programs 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.

ATF must ensure that all employees and non-ATF personnel have the highest degree of integrity and character, while maintaining the safety and security of ATF information, IT systems, and facilities. ATF would be unable to ensure the safety and security of its resources without verifying the identity and citizenship of candidates through this information collection. A candidate's onboarding for employment would also be delayed without this information collection. Additionally, this form provides initial verification of identity in accordance with HSPD-12 standards as required to issue a Personal Identification Verification card, which is required for ATF employees and contractors to access federal facilities and IT systems.

7. Explain any special circumstances that would cause the information collection to be conducted in a manner inconsistent with 5 CFR 1320.6.

There are no special circumstances associated with this information collection, which is conducted in a manner consistent with 5 CFR 1320.6.

8. If applicable, provide a copy and identify the date and page number, of the agency's notice published in the *Federal Register*, as required by 5 CFR 1320.8(d), soliciting comments on the information collection prior to submission to OMB.

The 60-Day Notice was published in the *Federal Register* on [xx/xx/xx] (XX FR XXXXX). The comment period ended on [xx/xx/xx]. ATF received no 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.

ATF has not assured respondents of confidentiality. However, the information being collected includes PII and is thus protected by the Privacy Act. The information is maintained by ATF in system of records, Justice/ATF-006, Internal Security Record System. The form that accompanies this ICR includes a Privacy Act statement that covers this information and informs respondents of the system of records, routine uses, etc.

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 information collection does not ask questions or require information of a sensitive nature.

12. Provide estimates of the information collection’s hour burden.

There are an average of 1,000 respondents completing this form each year. ATF therefore estimates that this average volume will extend to the future, although the number will likely be lower due to funding decreases and resulting impacts on jobs.

Each respondent responds one time per year. We estimate that it takes 5 minutes (0.08 hours) for a respondent to complete the form. The total annual burden hours associated with this collection are therefore 80 hours (1,000 candidates * 0.08 hours).

Because respondents must complete the identity verification process in order to be employed in the relevant ATF position, ATF assumes that they would not be doing the application during paid work time. Therefore, ATF calculated the monetized value of that time using a standard “leisure wage” formula. For this calculation, ATF used a methodology developed by the Department of Health and Human Services (HHS). Because HHS’s methodology relies on Bureau of Labor Statistics (BLS) data that is updated on a monthly basis, we did not need to use an inflation-adjusted wage rate. Accordingly, consistent with HHS’s methodology, we used the BLS median weekly income for full-time employees as the base from which to calculate the hourly leisure wage. Based on this methodology, ATF attributes a rounded value of \$23 per hour for time spent by respondents to complete the form.

We then multiplied the hourly burden outlined above by the \$23 hourly leisure wage rate to account for the value of time spent completing the form. The monetized annual hourly burden for this information collection is therefore \$1,840. Table 1 provides the number of respondents, annual number of responses, hourly burden, and monetized value of respondent time.

Table 1. Annual monetized hourly burden costs (rounded)

Activity	Number of respondents	Frequency per year	Total annual	Time per response	Total annual	Hourly rate per	Monetized value of
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			responses		burden (hours)	response*	respondent time
Personal Identify Verification	1,000	1 time	1,000	0.08	80	\$23	\$1,840

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

There are no additional costs associated with this information collection.

14. Provide estimates of the annualized cost to the federal government.

ATF estimates no additional costs to the federal government associated with this collection. This is due to the current staffing and administrative capacity already in place to complete any marginal processing required under this information collection, with long-term staffing capacity serving as a sunk cost.

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

There are no program changes or adjustments associated with this collection. However, the number of applicants has decreased from 2,000 to 1,000 due to budget cuts affecting positions available for applicants. This has resulted in a corresponding decrease in annual burden hours from 160 to 80. ATF has also added monetized value of the time which it has not done before.

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

ATF will not publish the results of this collection.

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 intends to display the OMB expiration date for this information collection.

18. Explain each exception to the certification statement.

This information collection does not include any exceptions to the certificate statement.

B. COLLECTIONS OF INFORMATION EMPLOYING STATISTICAL METHODS.

This collection does not employ statistical methods.