

SUPPORTING STATEMENT - PART A

Investigative Interview Survey - OMB #0705-0004

Summary of Changes from Previously Approved Collection

- There has been a large decrease in the number of respondents who were sent an IIS. With that, the cost of mailing has increased for each IIS sent and there has been a labor cost increase for both respondents and workers processing responses. Therefore, the annual number of responses and annual time burden has decreased while the annual cost has increased.

1. Need for the Information Collection

The Investigative Interview Survey (IIS) is under the control and supervision of the Personnel Vetting mission of the Defense Counterintelligence Security Agency (DoD Directive 5105.42 *Defense Counterintelligence and Security Agency*, January 16, 2025). The Personnel Vetting mission delivers efficient and effective background investigations, continuous vetting, and adjudications to safeguard the integrity and trustworthiness of the federal and contractor workforce. As the primary Investigative Service Provider (ISP) for the Federal Government, the Defense Counterintelligence Security Agency (DCSA) conducts over two million background investigations per year on civilian and military applicants and Federal employees or employees of Government contractors and consultants to Federal programs.

The information collected on the IIS is used by DCSA, particularly the background investigations program, to evaluate the investigative procedure exhibited by the investigator, the investigator's professionalism, and the information discussed and reported by Federal or Federal contract investigators. Furthermore, the information collected will be used to verify appropriate investigative techniques and methodologies that were used, and to validate the accuracy and correctness of the reports of investigation generated by investigators. Falsified or otherwise inaccurate reports of investigations have a direct impact on an applicant's security eligibility and could lead to a negative impact on national security. Completion of the IIS is voluntary. No PII is collected in the IIS, however, there may be some instances when a respondent reports personally identifiable information (PII) despite that survey instructions reflect not to provide PII.

DCSA's solicitation of information using the IIS is authorized pursuant to Section 925 of Public Law 115-91; and Executive Order 13467 as amended by Executive Order 13869.

2. Use of the Information

The Investigative Interview Survey (IIS) is used as a quality control instrument designed to ensure the accuracy and integrity of the investigative product. The IIS queries the recipient

about the investigative procedure exhibited by the investigator, the investigator's professionalism, and the information discussed and reported. In addition to the preformatted response options on the IIS, DCSA invites the recipient to respond with any other relevant comments or suggestions.

A random sampling of record and personal sources who were contacted during the background investigation process by investigators performing fieldwork are identified and IIS packages are prepared for each. The IIS package includes a hardcopy of the IIS as well as a self-addressed (to DCSA), pre-paid business reply envelope (BRE). The IIS package is mailed via U.S. Postal Service to the address DCSA has on file for the source. The source's contact information is known to DCSA because of their participation in a third party's background investigation.

The IIS is completed hardcopy by the recipient and returned to DCSA using the provided BRE. Results from the IIS are disseminated internally within DCSA for review and analysis. Quality assurance, field supervisors, and possibly inspectors will review the information collected to verify whether appropriate investigative techniques and methodologies were used, and to validate the accuracy and correctness of the investigation reports generated by investigators. Data is used by field supervisors to identify training needs such as source contacts and data collection techniques and methodologies. Data is also provided to contract oversight personnel and the fieldwork contractors themselves, with respect to information obtained on Contract Investigators. Lastly, data is used by the DCSA Office of Inspector General (OIG) as part of their investigations into specific background investigators who have demonstrated potential misconduct. In these instances, DCSA OIG mails IISs to an additional targeted sampling of sources who were contacted by those investigators.

3. Use of Information Technology

Once completed, forms are returned to DCSA, and data is entered into an IT database. The survey is subject to the Government Paperwork Elimination Act (GPEA). However, they are not posted on DCSA's website because the surveys contain information that is unique to a specific investigative source as well as the name of the field investigator and the subject who was investigated. Due to privacy considerations, the survey is not accessible through the DCSA public website.

Currently, the collection of information does not involve automated, electronic, mechanical or other technical collection techniques. Because DCSA must reach out to the investigative sources through their home or business addresses to solicit this information, our outreach is paper based. Currently, respondents receive the hardcopy IIS and return the completed IIS to DCSA via USPS mail; therefore 0% of information is collected electronically. DCSA is, however, evaluating future capabilities to leverage secure URLs and QR Codes for respondents to use to return survey information electronically rather than hardcopy. If pursued, the respondents would receive the IIS hardcopy (mailed to them following current operations), and the cover letter would explain two response options: (1) returning the completed IIS hardcopy, or (2) accessing and completing the IIS via the unique QR Code that appears on the respondent's particular letter.

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

Once a month, DCSA identifies IIS recipients. Recipients are investigation sources who participated in investigative interviews the month prior. The recency of the interview is critical to maximize the source's retained knowledge of the interview process to the greatest extent possible. A hardcopy IIS is prepared then mailed to a random selection of the sources. Completed IISs are returned at the leisure of the respondent and processed upon receipt by DCSA. Generally, IISs responses are processed throughout each month.

None of the surveys are used for any purpose other than 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 Monday, July 7, 2025. The 60-Day FRN citation is 90 FR 29853.

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

A 30-Day Federal Register Notice for the collection published on Tuesday, September 16, 2025. The 30-Day FRN citation is 90 FR 44650.

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 Investigative Interview Survey includes a Privacy Act Statement at the bottom of each survey. The survey references 5 U.S.C. 552a (the Privacy Act of 1974) and other laws protecting the rights of the respondent. Additionally, the form advises that information collected may be disclosed to DCSA personnel and shared externally with other authorized government agency personnel.

The applicable SORN is DSS/DCSA V2-01 "Inspector General Complaints";
<https://www.federalregister.gov/documents/1999/07/14/99-17668/privacy-act-of-1974-system-of-records>

This information collection is maintained in an IT system that does require a Privacy Impact Assessment (PIA). The applicable PIA for the DCSA Enterprise Service Delivery (ESD) system can be found using this link:

[www.dcsa.mil/Portals/128/Documents/Contact/FOIA/Enterprise%20Service%20Delivery%20\(ESD\)%20Platform%20\(section%201\).pdf](http://www.dcsa.mil/Portals/128/Documents/Contact/FOIA/Enterprise%20Service%20Delivery%20(ESD)%20Platform%20(section%201).pdf)

Records are temporary and destroyed 10 years after cutoff or 25 years after congressional or law enforcement activity, civil/criminal litigation, substantiated insider threat activity, and unfavorable employment or national security determination (DAA-0446-2022-0002, item 3; which superseded DAA-0446-2018-0003-0003). Paper records are destroyed by shredding or burning. Electronic records are erased or overwritten. The retention period differs from the schedule noted in the V2-01 SORN because the SORN is due to be updated; and DCSA Privacy will not update V2-01 as there is a pending DOD-Wide SORN for IG records with the Office of the Assistant to the Secretary of Defense for Privacy, Civil Liberties, and Transparency.

11. Sensitive Questions

No questions considered sensitive are being asked in this collection.

12. Respondent Burden and its Labor Costs

Part A: ESTIMATION OF RESPONDENT BURDEN

1) Collection Instrument(s)

Investigative Interview Survey (IIS)

- a) Number of Respondents: 35,300
- b) Number of Responses Per Respondent: 1
- c) Number of Total Annual Responses: 35,300
- d) Response Time: 6 minutes
- e) Respondent Burden Hours: 3,530 hours

2) Total Submission Burden

- a) Total Number of Respondents: 35,300

- b) Total Number of Annual Responses: 35,300
- c) Total Respondent Burden Hours: 3,530 hours

Part B: LABOR COST OF RESPONDENT BURDEN

1) Collection Instrument(s)

Investigative Interview Survey (IIS)

- a) Number of Total Annual Responses: 35,300
- b) Response Time: 6 minutes
- c) Respondent Hourly Wage: \$ 61.03
- d) Labor Burden per Response: \$ 6.10
- e) Total Labor Burden: \$ 215,435.90

2) Overall Labor Burden

- a) Total Number of Annual Responses: 35,300
- b) Total Labor Burden: \$ 215,436

The respondent hourly wage was determined by using the BLS-estimated average hourly wage for 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)

Investigative Interview Survey (IIS)

- a) Number of Total Annual Responses: 35,300
- b) Processing Time per Response: 0.1 hours
- c) Hourly Wage of Worker(s) Processing Responses: \$ 33.30
- d) Cost to Process Each Response: \$ 3.33
- e) Total Cost to Process Responses: \$ 117,549

2) Overall Labor Burden to the Federal Government

- a) Total Number of Annual Responses: 35,300
- b) Total Labor Burden: \$ 117,549

The worker hourly wage was determined by using the 2025 “Rest of US” pay scale; looking at the grade 9, step 5 pay.

<https://www.opm.gov/policy-data-oversight/pay-leave/salaries-wages/salary-tables/pdf/2025/RUS.pdf>

Part B: OPERATIONAL AND MAINTENANCE COSTS

1) Cost Categories

- a) Equipment: \$0
- b) Printing: \$2,824 (\$.08/letter)
- c) Postage: \$52,244 (\$1.48/letter)
- d) Software Purchases: \$0
- e) Licensing Costs: \$0
- f) Other: \$0

2) Total Operational and Maintenance Cost: \$55,068

Part C: TOTAL COST TO THE FEDERAL GOVERNMENT

- 1) Total Labor Cost to the Federal Government: \$ 117,549
- 2) Total Operational and Maintenance Costs: \$55,068
- 3) Total Cost to the Federal Government: \$ 172,617

15. Reasons for Change in Burden

The number of responses has decreased since the previous approval due to a large decrease in the number of respondents who were sent an IIS (a decrease of approximately 20,000). With that, the cost of mailing has increased for each IIS sent and there has been a labor cost increase for both respondents and workers processing responses. Therefore, the annual number of responses and annual time burden has decreased while the annual cost has increased.

16. Publication of Results

The results of this information collection will not be published.

17. Non-Display of OMB Expiration Date

DCSA is 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"

DCSA is not requesting any exemptions to the provisions stated in 5 CFR 1320.9.