SUPPORTING STATEMENT - PART A

Defense Counterintelligence and Security Agency (DCSA)

Freedom of Information / Privacy Act Records Request for Background Investigations

DCSA Form INV 100 - 0705-0001

Summary of Changes from Previously Approved Collection

- Revised section 1 using bold text to emphasize critical guidance for the requester.
- Enhanced section 6 for additional signature option and used bold text to draw the requester to the requirement.
- Increase in burden due to an increase in the public demand and hourly processing wage.

1. Need for the Information Collection

The purpose of the information collection is to enable the DCSA Freedom of Information and Privacy (FOIP) Office for Investigations to accurately locate relevant records maintained on individuals when they are requested pursuant to the Privacy Act of 1974. Authority to collect this information is contained in 5 U.S.C. § 552a, the Privacy Act of 1974, as amended; 10 U.S.C. 113, Secretary of Defense; 32 C.F.R. part 310, DoD Privacy Program, 32 C.F.R. part 321, Defense Security Service Privacy Program, and DoD 5400.11-R, Department of Defense Privacy Program, and Executive Order 9397, as amended.

The DCSA is the primary personnel vetting agency of the Federal Government dedicated to protecting America's trusted workforce conducting approximately 2 million background investigations annually. Upon the completion of a background investigation, the individual on whom the investigation was conducted may invoke their right to access those records under the provisions of the Privacy Act. Furthermore, they have a right to request Amendment of those records.

Information collected by the DCSA from individuals requesting a copy of their background investigation, or amendment of such, includes personal identifiable information (PII) such as: full name, social security number (SSN), address, date and place of birth, and other personal information. The information is used to accurately identity individuals and to ensure the highly sensitive information gathered during the investigative process is not inadvertently disclosed to a third party. The collection of PII is also necessary because many Federal employees, contractors, civilians, and military personnel share identical names and/or birth dates and their identities can only be distinguished by this information.

2. Use of the Information

The DCSA FOIP Office for Investigations accepts requests for records submitted via e-mail, facsimile, or postal mail. Due to the highly sensitive personal information that is contained in

our records, in order to positively verify the identity of the requester per DoD 5400.11-R, May 14, 2007, section C3.1.3, requests from individuals for information on themselves are required to provide their: full name, full social security number, date and place of birth and verify their identity under penalty of perjury to include a handwritten signature, or an electronic signature made via the a Common Access Card (CAC)/Personnel Identity Verification (PIV) signature. While not required, the Freedom of Information/Privacy Act Records Request for Background Investigations (INV 100) form standardizes the collection of the required information.

The DCSA FOIP Office for Investigations understands that while individuals are aware they are entitled to receive a copy of the records pertaining to themselves, they are not always aware of procedures required to make such a request and may choose not to utilize the INV 100. Often, requests are missing data elements which require contact with the requester, thereby adding time to the process. In these instances, the requester is notified that additional information is necessary prior to processing their request. Although the information is voluntary, we inform the requester that without the additional information we may be unable to locate relevant records. The information collection tool will decrease the burden on the requester to provide additional required information in order to gain access to their records and to simplify the process for identifying responsive records.

Once the DCSA FOIP Office for Investigations receives the completed form, the request is added to the workflow queue to be processed on a first-in, first-out basis. The INV100 is used to ensure that the relevant responsive records are retrieved from available data systems. For those records maintained at DCSA, but not under DCSA release authority, the FOIP Office will ensure those records are referred to the appropriate Federal agency(ies) having the jurisdictional control and release authority. The individual's request form (INV100) is attached to any referred records, so the receiving agency is privy to the initial request.

3. Use of Information Technology

The collection does involve a degree of automation, since the form is available in a portable document file (PDF) format. The form may be delivered as a scanned email attachment, via postal mail or facsimile to the FOIP Office for Investigations. If a respondent decides to digitally transmit their completed request, we advise that they validate the security of their system before transmitting. Respondents may also leverage use of the DoD Secure Access File Exchange (SAFE) system if they are unable to send their request via secure/encrypted email.

If the requester is submitting a FOIA request for agency records not pertaining to themselves, INV 100 may be transmitted electronically once completed, or printed and mailed or faxed to DCSA FOIP Office for Investigations.

If the requester is making a request for records about themselves, the INV 100 must be completed, then signed electronically with a CAC, PIV or Digital ID/certificate signature, or printed and contain a handwritten signature. DCSA's *Protection of Privacy and Access to and Amendment of*

Individual Records under the Privacy Act of 1974 regulation (32 C.F.R. § 310.3) explain a requester must sign the request and have it notarized or submit the request under 28 U.S.C. 1746. The completed Freedom of Information/Privacy Act Records Request for Background Investigations can then be mailed hardcopy, faxed, or scanned and emailed as an attachment to DCSA FOIP Office for Investigations.

4. Non-duplication

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

Information collected on the INV 100 is specific to the DCSA FOIP Office for Investigations. Use of the form is voluntary and collection of the information is only required if the individual makes a FOIA, Privacy Act or Amendment request.

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

Use of the INV 100 is intended to standardize the collection of the necessary information to simplify and make more efficient the process of making a Freedom of Information Act (5 U.S.C. § 552) and/or Privacy Act of 1974 (5 U.S.C. § 552a) request. Additionally, the standardized collection of information will enhance DCSA's request processing and minimize the number of imperfect requests submitted.

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 Wednesday September 2, 2026. The 60-Day FRN citation is 91 FR 56432.

One comment was received during the 60-Day Comment Period.

Comment: “To the Department of Defense / DCSA:

I am a private citizen. I support this collection. People should be able to see, and correct, the facts the government relies on to judge them: what they said and what was found. The investigators' notes, confidential sources, and methods behind those facts should stay protected, as the Privacy Act and FOIA exemptions provide, so people keep speaking honestly and investigations stay sound. DCSA needs enough identifying information to find the right file. The notice estimates 6,800 respondents a year at 5 minutes each (567 hours). I offer these asks.

Accountability
1. Publish yearly response-time statistics for requests under this collection: median and 90th-percentile days to first response and to final determination, plus the open-request backlog.
2. State whether the burden figures (6,800 respondents; 567 hours) were measured from recent requests or carried forward from a prior approval, and publish the prior approved burden for comparison.

Digital-First
3. Provide a secure online request portal as the default path for this form, with identity proofing that meets Privacy Act verification needs, while keeping mail and fax as backups.
4. Release the factual portions of a requester's own file, including their own statements and the findings used in the determination, with a clear path to correct errors, while withholding investigator notes, source identities, and methods. Block release of another person's file on a weak identity match.

Thank you for keeping people's own facts within reach while protecting investigative integrity.

Reconciliation Items
a. Needs and Uses ends a sentence at "related litigation," then prints a fragment with no verb: "The Law Enforcement, Congressional Inquiries, Department of Justice for Litigation, National Archives and Records Administration, and Data Breach Remediation, and Routine Uses found at http://dpcld.defense.gov/Privacy/SORNsIndex/BlanketRoutineUses.aspx."
b. The notice abbreviates the same office as "(FOIP)" in FOR FURTHER INFORMATION CONTACT and as "(FOI/P)" in Needs and Uses.

Respectfully,
Alec [Last Name Redacted]
California”

Agency Response to Comment: DCSA acknowledges the comment submitted regarding the INV 100 information collection (OMB Control Number 0705-0001). The suggestions concerning transparency of processing statistics, burden methodology, digital submission options, and release practices have been reviewed and will be taken into consideration as the Agency continues to administer this collection.

A 30-Day Federal Register Notice for the collection published on Wednesday, November 18, 2026. The 30-Day FRN citation is 91 FRN 74150.

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 included on page 1 of the information collection tool.

Any disclosure of this information collection tool or the information contained therein is in accordance with the Privacy Act of 1974, as amended, and the routine uses are found in DoD-wide System of Record Notice (SORN), DoD-0008 Freedom of Information Act and Privacy Act Records:

https://www.federalregister.gov/documents/2021/12/22/2021-27710/privacy-act-of-1974-system-of-records

A draft copy of the PIA, *DCSA Enterprise Service Delivery Platform*, has been provided with this package for OMB's review.

The information collection tool is maintained in the Privacy Act Case File located on the shared drive and may be retained for up to six years in accordance with the NARA General Records Disposition Schedules 4.2, item 20.

11. Sensitive Questions

The information collection tool does not ask questions of a sensitive nature pertaining to sexual behavior and attitudes, religious beliefs, race and/or ethnicity, and other matters that are commonly considered private.

Social Security Number (SSN): The collection of a requester's social security number is necessary to conduct an adequate search of records maintained in DCSA systems. The SSN is the primary personal identifier used in major national security systems, of many Federal agencies, and it remains the only unique identifier that ensures accuracy across all the systems for proper data retrieval. DoD Instruction 1000.30, *Reduction of Social Security Number (SSN) Use Within DoD*, stipulates that the use of the SSN as the single identifier which links personnel vetting files (e.g., background investigations, adjudication records, security clearance records, etc.) pertaining to a person is an acceptable use of the SSN. The solicitation of the SSN is

voluntary; however, without it the FOIP Office for Investigations may not be able to retrieve records from the systems response to the request. See Social Security Number Justification Memo submitted with this package.

12. Respondent Burden and its Labor Costs

Part A: ESTIMATION OF RESPONDENT BURDEN

1) Collection Instrument(s)
[DCSA Form INV 100]
    a) Number of Respondents: 6800
    b) Number of Responses Per Respondent: 1
    c) Number of Total Annual Responses: 6800
    d) Response Time: 5 minutes
    e) Respondent Burden Hours: 567 hours

2) Total Submission Burden
    a) Total Number of Respondents: 6800
    b) Total Number of Annual Responses: 6800
    c) Total Respondent Burden Hours: 567 hours

Part B: LABOR COST OF RESPONDENT BURDEN

1) Collection Instrument(s)
[DCSA Form INV 100]
    a) Number of Total Annual Responses: 6800
    b) Response Time: 5 minutes
    c) Respondent Hourly Wage: $33.54
    d) Labor Burden per Response: $2.80
    e) Total Labor Burden: $19,006.00

2) Overall Labor Burden
    a) Total Number of Annual Responses: 6800
    b) Total Labor Burden: $19,006.00

The Respondent hourly wage was determined by using the [Bureau of Labor Statistics Wage Estimate Website] ([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)
   [DCSA Form INV 100]
   a) Number of Total Annual Responses: 6800
   b) Processing Time per Response: 3.5 hours
   c) Hourly Wage of Worker(s) Processing Responses: $44.49
   d) Cost to Process Each Response: $155.72
   e) Total Cost to Process Responses: $1,058,862.00

2) Overall Labor Burden to the Federal Government
   a) Total Number of Annual Responses: 6800
   b) Total Labor Burden: $1,058,862.00

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: $1,058,862.00

2) Total Operational and Maintenance Costs: $0

3) Total Cost to the Federal Government: $1,058,862.00

15. Reasons for Change in Burden

The burden has increased since the previous renewal due to an increase in the public demand and due to the hourly processing wage.

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.