Supporting Statement
Facility Access Media (FAM) Request, NA Form 6006
(OMB Control No. 3095-0057)

1. **Circumstances making the collection of information necessary.** All individuals requiring recurring access to non-public areas of NARA's facilities and IT network must obtain NARA Facility Access Media (FAM). To obtain FAM, they must complete and submit the Facility Access Media (FAM) Request, NA Form 6006. Such individuals include NARA employees, contractors, volunteers, NARA-related foundation employees, foundation volunteers, interns, and other non-NARA Federal employees, such as Federal agency reviewers. People requesting FAM are referred to as "applicants." If we approve the request, the applicant receives a FAM, which provides access to the non-public areas of NARA's facilities and IT network. FAM can take different forms, including keys, access codes, and identification cards, among others.

   Collecting the information on the form is necessary to comply with Homeland Security Presidential Directive (HSPD) 12 requirements for secure and reliable forms of personal identification issued by Federal agencies to their employees, contractors, and other individuals requiring recurring access to non-public areas of Government facilities and information services. This form was developed to comply with this requirement. Its use is authorized by 44 U.S.C. § 2104.

   This collection includes information on classified contracts and clearance levels and dates to populate e-QIP (the Federal security background investigation system) and to sponsor the person for a Personal Identity Verification (PIV) card or issue temporary credentials.

   In July 2023, to control PII risks and improve the associated process, NARA change the format and function of NA Form 6006 from a fillable pdf to a two-part google form with a scripted workflow. This changes how information is collected and stored. The change divides the form workflow into two parts. The hiring manager or supervisor completes the first part and is subtitled Authorizing Official Initiate PIV/Access Request. The workflow automatically creates a form link for the hiring manager or supervisor to forward to the prospective employee. The second part of the form workflow collects PII and securely sends this data to a protected repository and is subtitled Candidate PIV/Access Request Submission. When the form record is generated from this data, it is also created in a protected folder. This creates a single instance of the record. In the previous iteration of the form, a digital, scanned, or printed copy was sent via email or hand delivered. This created multiple instances of the form record, placing PII in the hands of employees that did not need it.

2. **Purpose and use of the information.** NARA security staff across the agency use the collected information in the form as part of the process to verify the personal identity of the applicant, conduct background and security checks, enter information for national clearance checks, and authorize issuing the FAM. Some of the information is entered into the access control system database associated with facility card reader systems.

3. **Use of information technology and burden reduction.** The form is filled out electronically (fillable). Because of the low number of respondents annually, it is not cost effective for NARA to make this information collection GPEA-compliant. Processing, developing, and issuing the actual FAM is done electronically and is integrated agency-wide through the GSA Managed Services Office for PIV cards. On occasion, we need to issue temporary access media while awaiting the delivery of the PIV card, so we group both forms of access media under the term Facility Access Media (FAM).

4. **Efforts to identify duplication and use of similar information.** HSPD-12 mandates 5-year renewals of the PIV. Each renewal may include information that is found in an earlier application. While we have no process at present that can permit automatic use of the earlier information, it is likely that the systems being developed for Government-wide use in the PIV process will support minimizing duplicate information in the future through automatic population of certain fields on the form. When the FAM is renewed, however, the individual must type their name on the form which is confirmation of their signature.

5. **Impact on small business or other small entities.** The information collection does not have a significant impact on small businesses or other small entities.

6. **Consequences of collecting the information less frequently.** If the information collection were not conducted, applicants would either be refused admission to non-public areas of NARA's facilities and IT network or could be admitted to the facilities only with visitor passes, pursuant to requirements outlined in HSPD-12 and other Federal security policies. Applicants admitted as visitors would need to be continually escorted in non-public areas by NARA employees or the security force. This alternative would be an impractical and very inefficient use of staff time and could also be a security risk. To avoid an adverse impact, we need to collect the information when the FAM is first issued, when verifying security clearances, when there is a substantial change in personal information or security clearance of the FAM holder, and when reissuing the FAM. Most FAMs are issued for five years. Contractor FAMs are issued for five years or until the end of the contract. Agency reviewer FAMs are issued for the duration of their assignment with NARA, not to exceed five years. Before the FAM is reissued, a new form is filled out and the information is verified.

7. **Special circumstances relating to the guidelines of 5 CFR 1320.5.** The information collection is conducted in a manner consistent with the guidelines in 5 CFR 1320.5.

8. **Comments in response to the Federal Register notice and efforts to consult outside agency.** We provided the public an opportunity to comment on the information collection, published in the *Federal Register* on July 26, 2023 (FR 48267). We received no comments.

9. **Explanation of any payment or gift to respondents.** We do not provide a payment or gift to respondents for this information.

10. **Assurance of confidentiality provided to respondents.** We provide an assurance of confidentiality to respondents as required by the Privacy Act of 1974. The form contains a Privacy Act statement describing the authority, uses, and possible disclosures that may be made of the personal information we collect on the form. NARA 11, Credentials and Passes, is the SORN that covers this information collection request.

11. **Justification for sensitive questions.** We do not ask questions of a sensitive nature. However, we do request the following information of a personal nature: date of birth, height, weight, hair color, and eye color. This information is needed to ensure that the person receiving the FAM is accurately described for security control purposes. In addition, some applicants may present a social security card as one of the two forms of personal identification required to process the request, in accordance with OMB's guidance and implementation of HSPD-12.

12. **Estimates of hour burden including annualized hourly costs.** There are approximately 1,500 respondents per year, with a total annual time burden of 75 hours. The frequency is annual. It takes 3 minutes for applicants to complete their portion of the form. We determined the time by observing individuals complete the form.

    The hourly cost to each respondent is $1.82 ($36.32 per hour divided by 3 minutes). This estimate is based on the average employer cost for employee compensation of $36.32 per hour in the United States, as reported by the Bureau of Labor Statistics. *Employer Costs for Employee Compensation* (as of December 2018) news release, March 19, 2019, located at https://www.bls.gov/news.release/ecec.nr0.htm.

13. **Estimate of other total annual cost burden to respondents or recordkeepers.** There are no costs to respondents other than their time to complete the form. Respondents are not required to keep records solely to support their response.

14. **Annualized cost to the Federal Government.** We estimate that the annual cost to the Government for this information collection is $15,600. These costs include entering data for the access control system, operating the system in the Washington, DC, area, issuing the form, FAM, and proximity cards, and printing costs.

15. **Explanation for program changes or adjustments.** There is no change in burden.

16. **Plans for tabulation and publication and project time schedule.** We do not use this information collection for statistical publications.

17. **Reason(s) display of OMB expiration date is inappropriate.** We display the OMB expiration date for this information collection on the form.

18. **Exceptions to certification for Paperwork Reduction Act submissions.** We are not requesting any exceptions to the certification statement.