

Supporting Statement
By Defense Security Service (DSS), July 2013

“Voice of Industry Survey”
OMB #0704-0472

SUPPORTING STATEMENT – PART A

A. JUSTIFICATION

1. Need for the Information Collection

Executive Order 12829, "National Industrial Security Program (NISP)" Section 202 (a) directs that the Secretary of Defense serve as the Executive Agent for inspecting and monitoring "the contractors, licensees, and grantees who require or will require access to, or who store or will store classified information"; and, for determining the eligibility for access to classified information of contractors, licensees, and grantees and their respective employees. The specific requirements necessary to protect classified information released by U.S. Government agencies to contractors are set forth in the "National Industrial Security Program Operating Manual (NISPOM)" (DoD 5220.22-M). The Secretary of Defense, as Executive Agent, has the authority to issue, after consultation with affected agencies, standard forms or other standardization that will promote implementation of the NISP. Contractors participating in the NISP are subject to an initial Facility Security Clearance (FCL) Survey and periodic security inspections to determine their eligibility to participate in the NISP and to ensure that safeguards employed are adequate for the protection of classified information.

2. Use of the Information

Department of Defense Directive, 5105.42, "Subject: Defense Security Service", delineates the mission, functions and responsibilities of DSS. In accordance with this directive, DSS is an agency of the Department of Defense, currently under the authority of the Under Secretary of Defense for Intelligence (USD(I)). As it pertains to this request for authority to collect information, DSS is responsible for the following:

- (a) Administering and implementing the Defense portion of the NISP for DoD and 25 other non-DoD agencies pursuant to EO 12829.
- (b) Exercising authority delegated to the Secretary of Defense for the issuance of security clearances to contractor employees, pursuant to EO 12829.

DSS is the repository of records related to the maintenance of information pertaining to facility clearances and security information regarding those cleared contractors in the NISP that are under DSS security cognizance. The information is used to assess and advise Government Contracting Activities (GCAs) regarding the contractor's ability to protect classified information in its possession and to respond to inquiries regarding the facility clearance status and storage capability of cleared contractors.

The Voice of Industry survey provides feedback on DSS performance with respect to the administration and implementation of the NISP. Information from prior iterations have been used to provide tailored internal and external training products, workload prioritization, identification of best practices, mitigation of potential vulnerabilities, and overall enhanced the security posture of facilities in the NISP.

3. Use of Information Technology

Information technology is used for the purposes of this collection. DSS sends an email invitation to complete the Voice of Industry Survey directly to a designated security point of contact at the contractor facility. The email invitation includes a secure link to access and complete the online survey. The form is automated to minimize response time and responses are automatically collated in a central repository for ready analysis.

4. Non-duplication

The Voice of Industry Survey is the only methodology to collect information with regard to DSS administration and implementation of the National Industrial Security Program. No other collection vehicles exist to gather this information.

5. Burden on Small Business

The collection of information does not have a significant impact on small businesses or other entities. DSS is requesting the minimum amount of information necessary for evaluation and participation by eligible contractors participating in the NISP strictly on a voluntary basis. Aspects of smaller entities are integrated into the survey, and those smaller businesses automatically receive a shorter tailored format, omitting portions not relevant to their activities.

6. Less Frequent Collection

If this data is not collected, DSS will not have the ability to objectively evaluate performance related to the administration and implementation of the NISP as outlined in Executive Order (EO) 12829. Without performing this activity on an annual basis direct improvements to security programs in response to a rapidly evolving threat environment will go unrealized.

7. Paperwork Reduction Act Guidelines

No special circumstances exist that require the collection to be conducted in a manner inconsistent with the guidelines delineated in 5 CFR 1320.5(d)(2).

8. Consultation and Public Comments

A 60-Day Federal Register Notice was published in the Federal Register on 04/09/13, page 21,116. One comment was received, but it did not address the proposed collection. Prior feedback captured from users of the survey have highlighted the value of information and ease of use of the format.

9. Gifts or Payment

No payments or gifts will be provided to respondents.

10. Confidentiality

Information provided by the responding population is to be handled by DSS as "For Official Use Only," sensitive commercial information. This advisement will be contained in the instruction package to the contractor.

11. Sensitive Questions

There are no sensitive questions asked in this collection as defined by the OMB 83-I Instruction, 10/95.

12. Respondent Burden, and its Labor Costs

a. Estimation of Respondent Burden

- Responses per Respondent: 1
- Number of Respondents: 12,238
- Hours per Response: 30 minutes
- Total Annual Burden Hours: 6119

b. Labor Cost of Respondent Burden

- Total Annual Cost to Respondents: \$210,860.74 (12,238 x \$17.23)
- Cost to Individual Respondent: \$17.23 (\$0.574 per minute x 30 minutes)
- The cost to respondent is based on the approximate salary of a GS-13 Step 1 (FY13 basic pay): \$34.46 (rate per hour)/60 (minutes)= \$0.574 per minute.

13. Respondent Costs Other Than Burden Hour Costs

There is no cost associated with these tools for the survey submission. Completion and submission of the Survey questionnaire online requires an email address and Internet access, tools which cleared contractor facilities already have in place and/or have procedures in place to otherwise access online activities.

14. Cost to the Federal Government

- There are no administrative costs (printing, mailing, distributing and reviewing) since all action is taken through email and online survey tool.
- Explanation of Administrative Costs: not applicable.

- Total annual labor cost - \$4,451 GG-14 Step 4 with Washington DC Locality = \$55.64 hourly rate, 80 hours of estimated effort to deploy and analyze.

15. Reasons for Change in Burden

Respondent population has decreased or otherwise consolidated compared to the initial approval of this collection form. The decreased population results in decreased time and equivalent cost.

16. Publication of Results

There are no plans to formally publish the information collected. The data is analyzed and reported to DSS senior leadership for an assessment determination of DSS performance as per administration and implementation of the NISP, pursuant to Executive Order 12829.

17. Non-Display of OMB Expiration Date

Approval is not sought for avoiding display of the expiration date for OMB approval of the information collection.

18. Exceptions to "Certification for Paperwork Reduction Submissions"

None