



The Pinnacle of Hire Knowledge

June 4, 2013

U.S. Department of Homeland Security
National Protection and Programs Directorate
245 Murray Lane SW
Mail Stop 0610
Arlington, VA 20528-0610

RE: Information Collection Request for CFATS Personnel Surety Program (78 Fed. Reg. 17,680), Homeland Security Docket No. DHS-2012-0061

To CFATS Program Manager,

General Information Services, Inc. (GIS) is the second oldest and one of the largest background screening providers in the nation. GIS began with strong roots in providing services to the insurance industry to mitigate their risk and has always been known for our trusted client service. In 1996, GIS was purchased by current Owner and CEO, Raymond Conrad. From there, GIS became one of the first to offer web-based background screening services and dramatically expanded our capabilities and the industries we serve.

Over the past decade GIS has experienced record corporate growth (without acquisitions) in revenues, corporate size, and scope, and we now serve over 2,500 clients nationwide, from small business to many of the largest Fortune 500 companies. GIS employs more than 600 people and is headquartered in Chapin, South Carolina (just outside of the capital city of Columbia, SC). In addition, GIS has a Western Operations Center in Dallas, Texas, and sales offices throughout the nation. GIS also has a sister company, backgroundchecks.com with over 10,000 clients. GIS staffs over 100 in-house IT personnel for continued research, support, and development of our technology. GIS also has one of the strongest business continuity plans in place to ensure the security of data and uninterrupted operations. It is also important to note, unlike our major competitors, GIS does not off shore any portion of our US services or operations.

GIS appreciates the opportunity to comment on the information collection request regarding the CFATS Personnel Surety Program. In the information collection request, it is stated that:

Alternatively, high-risk chemical facilities, or their parent companies, may choose to comply with RBPS 12(iv) by outsourcing the information submission process to third parties. The Department anticipates that many high-risk chemical facilities will rely on businesses that provide contract services (e.g., complex turn-arounds, freight delivery services, lawn mowing) to the high-risk chemical facilities to identify and submit the appropriate information about affected individuals they employ to the Department for vetting pursuant to RBPS 12(iv).

Background Screening | e-Recruitment | Onboarding | Tax Credits

Businesses that provide services to high risk chemical facilities may in turn choose to manage compliance with RBPS 12(iv) themselves or to acquire the services of other third party companies to submit appropriate information about affected individuals to the Department.

While there are three primary options available to covered facilities as described in the information collection request, Direct Vetting, Use of Vetting, and Electronic Verification of TWIC, facilities will benefit by having choices in how they manage the vetting process. GIS agrees that there will be a need for third parties to submit information on behalf of some covered facilities, and agrees that this will provide covered facilities with flexibility and options in choosing how they will comply with the Personnel Surety Program requirements.

There are many that will take advantage of the newly proposed option 3, Electronic Verification of TWIC, by acquiring TWIC readers with electronic verification of the cards against the TSA Cancelled Card List, and that this will represent a best option to manage their Personnel Surety Program obligations under the available options.

For a number of reasons, however, there will be others who will need to use options 1 and 2, including using third parties to submit vetting information on their behalf. Among others, these reasons may include: travel time to TWIC enrollment centers, cost or turnaround time to obtain a TWIC, availability of TWIC enrollment centers, cost and uncertainty of TWIC readers, or the desire to vet covered individuals with additional background check elements not included in the disqualifying crimes in the TWIC Security Threat Assessment.

In the information collection request, it is also stated that:

To minimize the burden of submitting information about affected individuals, under Options 1 and 2 (as described above), high-risk chemical facilities would have wide latitude in assigning CSAT user roles to align with their business operations and/or the business operations of third parties that provide contracted services to them.

In order for third parties to service covered facilities, they will likely take advantage of collect data using their own systems, and transfer vetting data electronically rather than direct data entry into the CSAT tool. We would request assistance from DHS in establishing the data transfer protocols and formats in order to assist covered facilities.

Lastly, we would expect additional clarification to be provided by DHS where it is stated in the information collection request:

Background Screening | e-Recruitment | Onboarding | Tax Credits

General Information Services, Inc. | 917 Chapin Road | PO Box 353 | Chapin, South Carolina 29036

toll free 888.333.5696 | fax 803.932.2306 | email info@geninfo.com | web www.geninfo.com

Submitters must affirm that the required privacy notice regarding the collection of personal information has been provided to affected individuals before personal information is submitted to the Department.

GIS appreciates the opportunity to provide comments, so that we may support the covered facilities providing them the flexibility to use third parties to submit vetting information on their behalf.

Sincerely,

Brad Carlson

Vice President

General Information Services, Inc.

bcarlson@geninfo.com | geninfo.com

office: 763-377-9558 | cell: 763-233-8816 | fax: 803-932-3889

Background Screening | e-Recruitment | Onboarding | Tax Credits

General Information Services, Inc. | 917 Chapin Road | PO Box 353 | Chapin, South Carolina 29036

toll free 888.333.5696 | fax 803.932.2306 | email info@geninfo.com | web www.geninfo.com