

## **SUPPORTING STATEMENT FOR 0701-0134**

### **A. JUSTIFICATION**

#### 1. Need for the Information Collection

Information contained in the application for foreign government employment is required by the Secretary of State and Secretary of the Air Force to determine if proposed employment requires their approval in accordance with 37 USC, Section 908 and AFI 36-2913.

#### 2. Use of Information

Application processing personnel have always used the information to verify if employment is with or controlled in part or whole by a foreign government. If employment information is not collected and processed through the Secretaries of State and Air Force, then applicant is subject to having Reserve or retired pay withheld for the period of unauthorized employment. The Defense Finance and Accounting Service posts application information in the applicant's pay record.

#### 3. Use of Technology

Collection, at this time, involves no use of information technology since not all government agencies using the information have access to the same electronic or mechanical equipment. Cost benefit analysis is currently being conducted to determine the best way to improve access to the public. We continue to study this area and as soon as we determine that all agencies requiring the information are adequately equipped, electronic means of transmission may be utilized.

#### 4. Non-duplication

Since required information, other than name, grade, and Social Security Number, applies only to the request for approval of foreign government employment and is not maintained by any other agency, there is no possibility of duplication. The SSN is required for identification/tracking purposed. There are several initiatives on-going throughout the Department to explore alternatives to the use of the SSN; however, at the time, the Department has not arrived at a single solution. Basic written information is maintained only two years while a computer data base is maintained indefinitely.

#### 5. Burden on Small Business

The collection doesn't have significant economic impact and may affect small businesses. Affected applicants may own or may be investors in small businesses. According to 37 USC,

Section 908 and AFI 36-2913, Reservists and military retirees must obtain State Department and Secretary of the Air Force approval before accepting (paid or unpaid) employment with foreign governments. Applications are processed as expeditiously as possible to preclude any burden to applicants.

#### 6. Less Frequent Collections

If the information is not collected, there is no way for the Secretary of the Air Force and Secretary of State to know if Air Force members are violating Public Law. Information cannot be collected less frequently as it is collected only on the occasion that approval is required, usually only once from any one individual.

#### 7. Paperwork Reduction Act Guidelines

Requirement that respondents submit the original and four copies of each needed statement exist because several agencies must receive a signature copy. That requirement may be eliminated as scanning devices become more prevalent among government agencies.

#### 8. Consultation and Public Comments

The 60 day Federal Register notice was published on February 16, 2007 (72 FR 7619). Copy attached. No comments were received. Collection is conducted in a manner consistent with the guidelines in 5 CFR 1320.6. Outside agencies were consulted: The Director, Office of International Security Operations, Bureau of Politico-Military Affairs, United States Department of State, Washington DC 20520 is the approval/disapproval authority for the State Department. The phone number is (202) 736-7158. State Department officials determine if approval is required based on information provided by the applicant, 37 USC, Section 908, and AFI 36-2913. In addition, in telephone conversations with some respondents, they were asked for their comments concerning the ease of filling out necessary paperwork. No one indicated undue problems or hardships once they had the proper instructions.

#### 9. Gifts or Payments

No payments or gifts will be provided to the respondents.

#### 10. Confidentiality

This information is protected under the Privacy Act of 1974.

#### 11. Sensitive Questions

Sensitive information is not required in an application.

#### 12. Respondent Burden and its Costs

a. 10 applicants are estimated to complete the form. There is one response per applicant.  $10 \times 1 \text{ hour} = 10$  burden hours. Several respondents were contacted and their estimate of completing the application was 1 hour.

Number of Respondents: 10  
Frequency of Response: 1  
Total Annual Response: 10  
Hours per Response: 1 hour  
Total Burden Hours: 10

#### b. Out of Pocket Cost to Respondent

Cost to respondents:  
Wage of Respondent ( $\$11.00 \text{ per hr} \times 1 \text{ hour} \times 10 \text{ respondents}$ ) =  
 $\$110.00$  \*  
Postage ( $.39 \times 10$ ) = 3.90  
Coping cost ( $\$1 \times 10$ ) = 10.00  
Total cost to Respondents = \$123.90

\* This is based on the hourly wage of an average Air Force retiree (E-7).

#### 13. Cost of Respondent Burden

There are no capital or start-up costs associated with this information collection.

#### 14. Cost to the Federal Government

Cost to the Federal Government:  
Personnel cost =  $\$280$  (1 civilian  $\$28.00$  per hour)  $\times$  (10 forms at 1 hr per form)  
Printing and overhead costs =  $\$10$

Total Cost to the Federal Government:  $\$290.00$

15. Reasons for Change in Burden

Burden change is due to an adjustment in the number information collections. The average number of applicants has decreased from 212 to 10 over the period of the last approval. At an average of one hour per application, this equates to a decrease of 202 hours.

16. Collections of Information

The results for collection of this information will not be published.

17. Expiration Date

The Air Force is not seeking an exception to display the expiration date of this information.

18. Certification Statement

There are no exceptions to the Certification for Paperwork Reduction Act Submissions certification statement.

**B. COLLECTIONS OF INFORMATION EMPLOYING STATISTICAL METHODS:**

Statistical methods are not employed for this collection of information.