

SUPPORTING STATEMENT

Department of Defense Public and Community Service (PACS) Registry Program

A. JUSTIFICATION

1. Need for Information Collection.

The 1993 National Defense Authorization Act, P. L. 102-484, [10 USC, 1143a(c)] (Atch 1) requires the Secretary of Defense to maintain a registry of public and community service organizations. Service members selecting early retirement under the Temporary Early Retirement Act (TERA) are registered on the Public and Community Service Personnel Registry prior to release from active duty. Service members looking for employment in the public and community service arena, to include those that retired under TERA, can access the PACS Organization Registry to see which organizations have registered for the purpose of hiring separating military personnel in public and community service jobs. This information collection is needed to allow for the continued implementation of the Public and Community Service (PACS) Registry Program. The Public and Community Service (PACS) Registry is also needed to allow the Military Departments to continue to implement the Temporary Early Retirement Act (TERA) program (commonly referred to as "Early Retirement").

2. Use of Information.

The Public and Community Service (PACS) Registry Program is to encourage eligible Service members to work in the public or community service arena upon separation from active duty. In addition, it also allows those Service members with approved retirement under TERA to earn additional credit towards full retirement at age 62 by working in a public or community service job.

Employers with job openings in the public and community service arena will complete the one-time DD Form 2581 (Atch 2), "Operation Transition Employer Registration," to register in the PACS employers database. The DD Form 2581 is also used to allow PACS employers to post employment opportunities (Want Ads), on the Operation Transition Bulletin Board (TBB).

Those employers hiring separated Service members under the TERA program are required to complete the DD Form 2581-1 (Atch 2), "Public and Community Service Organization Validation," to be validated. This validation allows retirees, being hired by the PACS organization, to earn additional retirement credit needed towards gaining full retirement for 20 years of creditable service. Once the retiree reaches the age of 62 he/she will be compensated for retirement for 20 years of service. The information from the DD Form 2581-1 is also used by the Department to validate that the employer meets the criteria of a PACS organization.

An 800 number is available to provide assistance and general information to employers.

The Department also provides demonstrations and information briefings to other Federal Government agencies, private sector employers and organizations relating to the PACS program. The information is limited to how the system is set up; how it works; and procedures to follow to get approval to use the system. Information collected is provided to Federal Government agencies on a “need to know” basis or based on valid agency requests. For example, Department of Labor may request the number of employer respondents, or the number of employers registered in PACS.

Over the past three years, this information collection has been used in Congressional testimony to show that the Department has successfully implemented the Transition Assistance Program as required by Public Law 102-484 [10 USC 1143a (c)]. The information collection has and continues to be used to educate and inform other Federal Government agencies about the PACS Program. The information is also used to inform private sector employers, organizations, associations, and State and local government agencies on how the system works, the benefits derived from providing such a service to employers who desire to hire individuals looking for employment in the public and community service arena. Lastly, the information collection is used to show that the Transition Assistance Program is a success, i.e., the benefits such a program has to organizations downsizing, contemplating downsizing, or restructuring its workforce which will result in employee terminations; and the value added to the organization for providing quality outplacement services for employees.

3. Improved Information Technology.

Currently, the DD Form 2581 and DD Form 2581-1 are available on-line and can be accessed through the DoD Forms Web site. The URL for that site can be accessed through <http://www.dtic.mil/whs/directives/infomgt/forms/formsprogam.htm>. Forms can be downloaded or completed on-line, then faxed to the Defense Manpower Data Center (DMDC), Seaside, California for processing.

The Defense Outplacement Referral System (DORS), previously associated with this information collection, ceased to exist as of December 31, 1999. A majority of the respondents were for DORS. In addition, the TERA program for Service members selecting early retirement who register under PACS, by law ended September 1, 2002. The number of respondents continue to decline on an annual basis. As a result, due to the limited number of respondents, it is not cost effective to electronically maintain, submit, or disclose information. It is also not cost effective to use and accept electronic signatures. If there is a change in the Program in the future the Department will reconsider receiving the information from the respondents electronically to include electronic signatures.

The Department uses personal computers to input information from hard copy documents into an automated database. Technology reduces the time it would take to retrieve and make information available to employers, as well as reduces the number of personnel it would take to manage and implement this program.

The PACS system allows registered employers with Internet access and a Web browser to post “Want Ads” on the DoD Operation Transition Bulletin Board (TBB). Interested retirees can go to the TBB and look for PACS employment opportunities as well as see a list of approved PACS organizations.

4. Efforts to Identify Duplication.

Initial efforts to develop these programs and systems indicated there was no existing database for employers and public and community service organizations. Investigation resulted in no findings of duplicate reporting of records.

5. Methods Used to Minimize Burden on Small Entities.

The information collection will not have a significant economic impact on a substantial number of small entities.

6. Consequences of Not Collecting the Information.

If the collection of information were not accomplished, the DoD would not be able to comply with the current law. The information collected is not available in any centralized location. The PACS validation information can only be provided by the organization.

7. Special Circumstances.

There are no special circumstances. This collection will be conducted in a manner consistent with the guidelines contained in 5 CFR 1320.5(d)(2).

8. Agency 60-Day Federal Register Notice and Consultations Outside the Agency.

An agency 60-Day Federal Notice was published in *Vol. 72, No. 46, March 9, 2007 Federal Register, pages 10716/10717, as required by 5 CFR 1320.8(d)* (Atch 3). No public comments were received in response to the notice.

a. This information collection has been reviewed by the following individuals:

<u>Name</u>	<u>Organization</u>	<u>Phone Number</u>
Herb Schwab	US Army	703) 325-2574
David DuBois	US Navy	(202) 433-4592
Peggy Rayfield	US Air Force	(210) 565-2631
Sheri Makayan	US Marine Corps	(703) 784-9523
Jean Forrest	DMDC	(831) 583-2400

b. Those reviewing the information collection identified no problems.

9. Payments to Respondents.

No payment or gift will be made to respondents.

10. Assurance of Confidentiality.

This information collection does not ask the respondent to submit proprietary, trade secret, or confidential information to the Department.

Authorized users are assigned a user name which enhances safeguards to the system and those authorized to use it. All information in the Public and Community Service (PACS) database is maintained in a secure manner. No information is released to unauthorized individuals.

Information on PACS organizations is released to authorized individuals via the Operation Transition web site (<http://www.dmdc.osd.mil/ot>). Access to the Operation Transition web site is restricted to three types of authorized users: military personnel, Department of Defense federal civilian employees, and registered organizations.

Transitioning military personnel who are on active or reserve duty, or who have separated or retired not more than 180 days prior to the date of login, as well as DoD civilians, may view a list of approved PACS organizations on the Operation Transition web site. The purpose is to encourage employment in the public and community service sector as directed by Public Law 102-484. To gain access to the web site, these users enter their Social Security Number (SSN), last name, and date of birth. The Operation Transition web site uses Secure Sockets Layer (SSL) version 3.0 which encrypts sensitive data such as SSN, last name, and date of birth. (DMDC adheres to the Federally required FIPS-140 compliant cipher suites and SSL version 3.0 which uses "strong encryption", also known as "128-bit encryption".) When the user clicks "Login", the information is immediately encrypted, then transmitted to DMDC where the information is verified against an official Department of Defense database. There are a number of initiatives throughout the DoD, including DoD Agencies such as DMDC, to explore viable alternatives to the use of an individual's SSN, and in this case, to replace the SSN as a key identifier in user authentication for the web site. However, at this time, the Department has not arrived at a single solution.

PACS organizations registered with Operation Transition are issued a registration number and password so that they may enter the Operation Transition web site to view the list of PACS organizations and any job want ads posted for their own organization only.

11. Sensitive Questions.

There are no questions of a sensitive nature in this collection effort.

12. Estimates of Annual Response Burden Hours and Labor Costs to the Respondent for Collection of Information.

a. Response Burden:

(1) DD Form 2581

Total annual respondents:	334
Frequency of response:	1
Total annual responses:	334
Burden per response:	15 minutes
Total burden hours:	$5010/60 = 83.5$ hours

(2) DD Form 2581-1

Total annual respondents:	80
Frequency of response:	1
Total annual responses:	80
Burden per response:	10 minutes
Total burden hours:	$800/60 = 13.3$ hours

(3) Total Average Response Burden.

Total annual respondents:	414
Frequency of response:	1
Total annual responses:	414
Burden per response:	$5,810/414 = 14.03$ minutes
Total burden hours:	$414 \times 14.033 = 5,809.66/60 = 97$

Average frequency of response: 414 annual responses divided by 414 annual respondents = 1 respondents

Average burden per response: 5,810 total burden minutes divided by 414 responses = 14.03 minutes

Total burden hours: Total annual responses = 414 multiplied by average burden per response $\times 14.033 = 5,809.66$ minutes divided by 60 = 97 total average burden hours.

b. Explanation of How Burden was Estimated:

A test was conducted by DMDC of employers completing the DD Form 2581 and DD Form 2581-1. The amount of time it took for these personnel to complete the process was averaged.

c. Cost to Respondent.

(1) The costs for the respondents are as follows:

DD Form 2581 (to include on-line version)

Employer Costs:

Personnel Clerk (\$39.81/hr) at 0.25 hours \$9.95

TOTAL EMPLOYER COSTS: \$9.95

Total cost at 334 respondents \$3,323.30

DD Form 2581-1 (to include on-line version)

Employer Costs:

Personnel Clerk (\$39.81/hr.) at 0.17 hours \$6.77

TOTAL EMPLOYER COSTS: \$6.77

Total cost at 80 respondents \$541.60

Total Labor Cost to Respondent \$3864.90

13. Estimates of Cost Burden for the Respondent for Collection of Information.

a. Total Capital and Start-up Cost.

There are no capital or start-up costs associated with this information collection. Respondents will not need to purchase equipment or services to respond to this collection because non-profit, not for profit, local, State and Federal government agencies have access to fax machines and they are conducting other business with facsimiles. Also, they will already own a computer that is used for many other purposes.

b. Operation and Maintenance Cost.

There are normally fees for Internet access; however, the respondent will be using the Internet for many other purposes besides PACS. The cost involved for connectivity for this program is negligible.

14. Estimates of Cost to the Federal Government.

DD Form 2581

Operational Costs

Hourly cost Personnel Clerk \$39.81 at 0.25 hours each form
\$9.95

Overhead rate (included in above rate)

Direct equipment

\$1.31

Cost to fax form

\$0.019

\$11.279

Estimate for Federal Government Cost for 414 x \$11.279 responses = \$4,669.51

DD Form 2581-1

Operational Costs

Hourly cost of Personnel Clerk \$18.00) at 0.25 hours each form \$4.50

Overhead rate (.15 times \$4.50 each form) \$0.68

Direct equipment \$1.31

Cost to fax form \$0.019

\$6.509

Estimate for Federal Government Cost for 63 x \$6.509 responses =
\$410.07

Equipment and software to run PACS is part of a larger system. Direct costs to the government for maintaining the PACS portion is minimal.

15. Changes in Burden.

Change in burden is due to re-estimation of the number of eligible applicants.

16. Publication Plans/Time Schedule.

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

17. Approval Not to Display Expiration Date.

The agency will display the expiration date.

18. Exceptions to the Certification Statement.

There are no exceptions to the Certification Statement.

B. COLLECTION OF INFORMATION EMPLOYING STATISTICAL METHODS

This information collection does not employ statistical methods.