

SUPPORTING STATEMENT

A. JUSTIFICATION

1. Need for Information Collection

Title 10 United States Code (USC), Section 505, established minimum and maximum age standards for enlistment in the Armed Forces, and Title 10 USC, Section 504, 532 and 5013 established citizenship requirements for enlistment (Atch 1). This information collection is required to determine age qualification and support applicant's claims of citizenship status for enlistment when the individual applicant can not provide proof of birth, such as a birth certificate.

2. Use of Information

The purpose of this information collection is for verification of birth to ensure that an applicant does not fall outside the age limits, and that their place of birth supports the citizenship requirements claimed by the applicant. This verification, in turn, enables the Department of Defense (DoD) to ensure applicants meet citizenship requirements for enlistment into the Armed Forces.

The form associated with this information collection is the DD Form 372, "Request for Verification of Birth" (Atch 2). When an applicant is unable to provide a birth certificate, military recruiters use the DD Form 372 to verify data for enlistment eligibility. The respondents include state and local agencies (primarily the Bureau of Vital Statistics), which provides recruiters with verification of the applicant's birth date and location (i.e., birth certificate data). The DD Form 372 is recognized by state and local agencies as the official DoD form for collecting required information about an applicant's age and place of birth. Periodically, this information may be collected in paper copy, telephonically, or via faxes or e-mails of scanned completed forms. On occasion, telephonic verification is conducted by the recruiter when it appears that undue delay in receipt of birth verification will result in an excessive time in processing an otherwise desirable applicant. Recruiters will articulate the agency disclosure notice information to the respondent. The recruiter receiving the information will complete SECTION II of DD Form 372 by writing down the name and title of the official supplying the information. The respondent is still required to forward the complete DD Form 372 to the recruiter, who in turn will place the completed DD Form 372 in the applicant's packet.

Since the institution of this form, the information collected has been used by DoD to verify enlistment eligibility/acceptability for military enlistment and to gather statistical information about the population composition of our Armed Forces.

3. Improved Information Technology

All services targeted at least 30% electronic submission for DD Form 372. Access to the electronically-generated form is available on the DoD World Wide Web at Defense Link/Publications site. Recruiters will electronically produce the form and enter the appropriate data before obtaining birth verification data from respondents.

The use of faxes in secure or controlled areas and e-mails (with a scanned copy of a DD Form 372 as an attachment) to transmit the completed/signed forms is encouraged and accepted.

4. Efforts to Identify Duplication

The Joint Service Forms Working Group, comprised of representatives from each Service's Recruiting Command, conducted a review of this information collection, and this working group indicated no duplication of information. The DD Form 372 is the only request for birth data; it is viewed as the official DoD request for birth verification by the states and bureaus of vital statistics.

5. Methods Used to Minimize Burden on Small Entities.

The collection of information does not involve small business or other small entities.

6. Consequences of Not Collecting the Information.

If collection were stopped, DoD would not be able to comply with the current laws.

7. Special Circumstances.

Collection is not conducted in a manner inconsistent with the guidelines in 5 CFR 1320.5 (d)(2).

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

The 60-day Federal Register Notice announcing this proposed information collection (as required by 5 CFR 1320.8(d)) was published on August 27, 2007, vol 72, No. 165, page 48989 (Atch 3). No comments were received in response to this Notice.

This information collection and the DD Form 372 were reviewed by the Joint Service Forms Working Group and no changes were recommended.

9. Payments to Respondents.

There is no payment, gift, or guarantee made to respondents who provide this information.

10. Assurance of Confidentiality.

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

The recruiter receives the information and uses it to verify data given by the applicant and to determine his/her qualification for enlistment. The information is stored at the local recruiting headquarters and destroyed approximately one year after enlistment or rejection of enlistment. The information is accessible to the recruiter and investigative officer on an as needed basis. All data are protected by the Privacy Act of 1974.

The DD Form 372 was reviewed by WHS Privacy Office, Mr. Dave Henshall, and it was determined that a Privacy Act Statement was not required since the privacy information was not collected from the individual applicant. The information is transferred by the recruiter to the DD Form 372 Section 1, from the forms that comprise the applicant's packet: SF 86 "Questionnaire for National Security Positions" and, DD Form 1966 "Record of Military Processing – Armed Forces of the United States," all of which have a privacy act statement and are covered under system of records (Atch 4).

11. Sensitive Questions.

Responses requiring gender are requested to ensure accurate identification of the applicant's sex and to determine the total number of male and female applicants.

12. Estimates of Annual Response Burden and Labor Cost for Hour Burden to the Respondent for Collection of Information.

A. Response Burden for DD Form 372.

| | |
|---------------------------|-----------------------|
| Total annual respondents: | 100,000 |
| Frequency of response: | 1 |
| Total annual responses: | 100,000 |
| Burden per response: | .083 hour (5 minutes) |
| Total burden hours: | 8,300 hours |

B. Explanation of How Burden was Estimated.

The burden estimate of .083 hour (minutes) was verified by Services Recruiting Command representatives on the Forms Committee and prior estimates for use of this form.

C. Labor Cost to Respondent.

| | |
|--|---------------|
| Respondents estimated hourly average pay of \$18.00 (with inflation) X .083 = \$1.49 PER FORM | |
| 100,000 Respondents @ \$1.49 per form | \$149,000 |
| TOTAL ANNUAL COST | \$149,000 |

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

A. There is no capital or start-up costs associated with this information collection. Respondents will not need to operate or maintain equipment or services to respond to this information collection.

B. Operation and Maintenance Cost.

There is no O&M cost to the respondents who complete DD Form 372.

14. Estimates of Cost to the Federal Government.

Cost to Print Form:

70,000 forms at \$.07 per form (approx cost with inflation) \$4,900

Cost to Process Form:

E-6 estimated hourly average pay of (annual DoD composite)
\$37.57 X 0.25 (15 minutes) = \$9.39 per form
100,000 forms @ \$9.39 per form \$939,000

Cost to Mail Form:

70,000 mailings at \$0.41 X 2 mailings \$57,400

Note: This number accounts for a 30% reduction for faxing and e-mailing of completed forms instead of mailing.

15. Changes in Burden.

There has been no change to the burden hours.

16. Publication Plans/Time Schedule.

The results of this information collection will not be published.

17. Approval Not to Display Expiration Date.

Approval to not display an expiration date is not being sought.

18. Exceptions to the Certification Statement.

No exceptions to the certification statement are being sought.

B. COLLECTION OF INFORMATION EMPLOYING STATISTICAL METHODS

Statistical methods are not employed for collection of this information.