

SUPPORTING STATEMENT

National Language Service Corps Pilot

A. JUSTIFICATION

1. Need for Information Collection

The President's Management Agenda of FY 2002 establishes the goal that agencies will build, sustain, and effectively deploy the skilled, knowledgeable, diverse, and high-performing workforce needed to meet the current and emerging needs of government and its citizens. As a subset to this Agenda, President Bush announced his National Security Language Initiative (NSLI) in January 2006, which directed the Department of Defense to establish a three-year pilot program, administered by the National Security Education Program (NSEP), for the development and implementation of The Language Corps, now known as the National Language Service Corps (NLSC). The NLSC was launched in the Fall 2007, with Congressional authorization and funding granted through the Intelligence Authorization Act for Fiscal Year 2005 (P.L. 108-487, Sec. 613) and the John Warner National Defense Authorization Act for Fiscal Year 2007 (P.L. 109-364, Sec. 944). The mission of the NLSC is to identify individuals with language and special skills who may potentially qualify for temporary employment or service opportunities in the public sector during periods of national need or emergency. The NLSC is established as a Pilot program that, upon becoming fully operational, will fill gaps between federal and state requirements and available language skills. It will provide the capabilities for meeting short-, mid-, and long-term requirements through the identification and warehousing of expertise and skills in critical languages. This information can be disclosed to government agencies if the skills meet a requirement they have in support of national security objectives. The following codes and directives authorize the NLSC to maintain a system whereby a pool of members with specific language skills can be readily referenced: DoD Directive 5124.2, Under Secretary of Defense for Personnel and Readiness; 50 U.S.C. 403-1b, War and National Defense; Public Law 109-364, Sec. 944, Administration of pilot project on Civilian Linguist Reserve Corps; and Public Law 108-487, Sec. 613, Pilot Project on Civilian Linguist Reserve Corps.

2. Use of Information

The documents associated with this information collection were created solely to comply with the requirements set most recently by the President's National Language Security Initiative and ultimately his Management Agenda. The purpose of this collection is to identify individuals with language and special skills who potentially qualify for employment or service opportunities in the public sector during periods of national need or emergency. For the Pilot, the NLSC estimates about 4,000 individuals will apply for Charter Membership annually. Although the NLSC contractual goal is to recruit 1,000 individuals, more will be need to account for attrition. Fewer than 200 individuals will actually be selected for temporary federal employment during the Pilot.

The DD Form X558, *National Language Service Corps Application*, is the initial document used to collect information from members of the public. The National Language Service Corps Application form contains a brief set of screening questions. Applicants fill this out for basic information (age, citizenship, Foreign Language), and if they meet eligibility criteria, they proceed to the supplemental documents. For all burden estimations, the NLSC assumes 3,000 applicants will also need to complete the supplemental documents, since language proficiency is not initially screened until all documentation is completed.

The supplemental documents are used to determine eligibility for membership in the National Language Service Corps. The DD Form X560, *National Language Service Corps (NLSC) Global Language Self-Assessment*, provides an overall assessment of the applicant's foreign language ability. The DD Form X559, *National Language Service Corps (NLSC) Detailed Skills Self-Assessment*, is a detailed description of the applicant's skills with respect to specific foreign language tasks. The DD Form X561, *National Language Service Corps (NLSC) Language Data Sheet*, provides background data on where the applicant learned the foreign language and whether the applicant has used the language professionally. These three supplemental documents are used in conjunction for the following purposes:

- a. Certification of language skills for entry into the NLSC
- b. Quality assurance of certification.

The information collected in the application and the supplemental documents is used solely by the National Language Service Corps.

3. Improved Information Technology

The NLSC website URL, www.NLSCorps.org, was selected by the Director of the National Security Education Program for the Pilot to stay consistent with the branding of the organization. For the full-up organization, the website and its URL will evolve in accordance with overarching policy. The NLSC forms, DD Form X558, *National Language Service Corps Pilot Application*, DD Form X560, *National Language Service Corps Pilot Global Language Self-Assessment*, DD Form X559, *National Language Service Corps Pilot Detailed Skills Self-Assessment*, and DD Form X561, *National Language Service Corps Pilot Language Data Sheet*, will be available to the public via the website, www.NLSCorps.org, as downloadable, fillable PDF files. Additionally the documents can be mailed or faxed as hardcopies. Finally, the NLSC website offers the user the ability to submit the same information collected in the DD Forms (X558 through X561) online. The online forms will be as follows:

- a. NLSC online application and Language Data Sheet
- b. NLSC online self-assessments for listening
- c. NLSC online self-assessments for reading
- d. NLSC online self-assessments for writing
- e. NLSC online self-assessments for speaking

Full implementation of electronic signatures, as required under the Government Paperwork Elimination Act, is not implemented for the NLSC Pilot at this time for the online application; however, the full-up organization will implement e-signatures to validate data entry. For the Pilot, when a valid application with a handwritten signature is received, a control

number and password will be assigned to each individual applying. These prospects will use the assigned numbers and passwords to complete and validate their documentation. The NLSC staff will use these control numbers to track online data entry by the applicant. All control numbers will be tracked manually.

4. Efforts to Identify Duplication

The NLSC Pilot is a new program and no other government agency is responsible for collecting this information.

The NLSC is unique in its charter to provide surge capacity for a wide range of languages across the entire Federal government.

5. Methods Used to Minimize Burden on Small Entities

The NLSC collects information from individuals only and does not place burden on Small Entities.

6. Consequences of Not Collecting the Information

Without the ability to collect information on new Charter Members, the National Language Service Corps Pilot cannot test the processes and procedures associated with the development of a national registry of individuals with certified language expertise. As such, the Department of Defense cannot administer the National Language Service Corps Pilot without the ability to recruit and access its initial Charter Members. Therefore, the DoD is not in compliance with the John Warner National Defense Authorization Act for Fiscal Year 2007 (P.L. 109-364, Sec. 944) and will not be until such authority is granted.

7. Special Circumstances

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

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

This information collection implements the John Warner National Defense Authorization Act for Fiscal Year 2007 (P.L. 109-364, Sec 944). Public comments have not yet been solicited pending the implementation of this statute. Public comments for this critical information collection requirement will be solicited in the Federal Register concurrent with emergency approval of this proposal

This statute addresses vital gaps in federal preparedness and reinforces the importance of language skills in the American population and the U.S. education system. No other federal agency addresses the capabilities for quickly meeting short-, mid-, and long-term requirements through the identification and warehousing of expertise and skills in current and potential critical languages. The NLSC Pilot will remain within the DoD until external partnerships are established. Individuals outside the NLSC have contributed their theories and direction for the new program. They are listed below:

NAME	COMPANY	PHONE
Mary A. Augsburger	USAF/A1XC	(703) 604-8154
Hakeem A. Basheerud-Deen	OPM	(202) 606-1434
Gregory Duffy	USAF/A1DLL	(703) 697-0896
Christina Vay	OPM	(202) 606-1143
Chris Honeycutt	USAF/REPI	(703) 588-6068
Ava Marlow-Hage	JS/J1	(703) 697-3898
Rose Jourdan	USAF/A1DO	(703) 697-9012
Kevin Rafferty	USMC/DTAS	(703) 784-9049
Raoul Vicencio	JS/J1	(703) 697-5504
Alonzie Scott	USN/OPNAVN11	(703) 695-2881
Charles Borchini	USA/95 th CAB	(407) 552-7375

9. Payments to Respondents

There are no payments 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.

11. Personal Identifying Information, Sensitive Questions, and Protection of the Information

With regards to disclosures generally permitted under 5 U.S.C. 552a (b) of the Privacy Act, personal records or information may specifically be disclosed outside the DoD as a routine use pursuant to 5 U.S.C. 552a (b) (3). The NLSC Pilot application will not require an applicant to provide a SSN or gender. Access to personal information is restricted to NLSC personnel who require the records in the performance of their official duties. Access to personal information is further restricted by the use of passwords that are changed periodically. Physical entry is restricted by the use of locks, guards, and administrative procedures. A System of Records Notice (SORN) has been initiated, but is pending approval of this information collection.

12. Estimates of Annual Response Burden and Labor Cost for Hour Burden to the Respondent for Collection of Information. The response burden is estimated with the assumption that 4,000 individuals will initially apply for Charter Membership by completing the DD Form X558 either through the online application or mailing it in. Of those initial applicants, the NLSC estimates 3,000 will satisfy basic requirements and be invited to complete and submit the remaining NLSC documents (DD X559, DD X560, DD X561) either by completing them online or submitting them via mail. Of the 3,000 that complete the second submission of documents, the NLSC estimates 1,000 to 1,500 will meet the requirements and be selected for the NLSC Pilot Charter Membership. There is no further burden on those not selected for the Pilot. The NLSC estimates at least 1,000 Charter Members will be required to satisfactorily evaluate organizational processes and procedures. To account for attrition throughout the Pilot, the NLSC estimates up

to 1,500 members will be required to maintain 1,000. Finally, of the 1,000 Charter Members, fewer than 200 will be temporary federal employees. These 200 will be used for exercises and validation of specific tasks for the Pilot.

a. Response Burden

The response burden is calculated for DD Forms X558 and X561. No response burden is calculated for DD Forms X559 and X560 as they are exempt under 5 CFR Part 1320.3(h)(7).

(1) DD Form X558

Total annual respondents:	4,000
Frequency of response:	1
Total annual responses:	4,000
Burden per response	18 minutes
Total burden hours:	72,000 mins/60 = 1,200 hours

(2) DD Form X561

Total annual respondents:	3,000
Frequency of response:	1
Total annual responses:	3,000
Burden per response	20 mins
Total burden hours:	60,000 mins/60 = 1,000 hours

(3) Total Average Response Burden for two submissions

Total annual respondents:	4,000
Frequency of response:	1.75/respondent
Total annual responses:	7,000
Burden per response	18.86 minutes
Total burden hours:	132,000 mins/60 = 2,200 hours

b. The estimate for the burden per response was determined by averaging the time it took six people to complete DD Forms X558 and X561.

c. Labor Cost to the Respondents

Federal scale NSPS Payband YA-01 minimum wage is \$12.32/hr and non-Federal employees' minimum wage is \$5.85/hr. For estimation purposes, 50% of the applicants are assumed to have earnings equivalent to Federal employees in the YA-01 payband and the other 50% are assumed to have earnings equivalent to the US minimum wage..

(1) DD Form X558

$$\$12.32/60 \text{ mins} = \$.205 \text{ a min} \times 18 \text{ mins} + \$3.69 \times 2,000 = \$7,380.00$$

$$\$5.85/60 \text{ mins} = \$.098 \text{ a min} \times 18 \text{ mins} + \$1.75 \times 2,000 = \$3,500.00$$

(2) DD Form X561

$$\$12.32/60 \text{ mins} = \$.205 \text{ a min} \times 20 \text{ mins} + \$4.1 \times 1,500 = \$6,150.00$$

$$\$5.85/60 \text{ mins} = \$.098 \text{ a min} \times 20 \text{ mins} + \$1.96 \times 1,500 = \$2,940.00$$

Total Labor Cost: \$19,970.00

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

- a. Total Capital and Start-up Cost. There is no capital or start-up cost to the respondent.
- b. Operational and Maintenance Cost. There is no operational and maintenance cost to the respondent. A Bulk Mailing Permit will be used for materials that are sent to the respondent and material that will be returned by the respondent.

14. Estimates of Cost to the Federal Government:

Federal scale Payband YA-01 minimum wage \$12.32/hr

(1) DD Form X558 (90% are expected to be completed online)

Manual processing:

$$\$12.32/60 \text{ mins} = \$.205 \text{ a min} \times 5 \text{ mins} + \$1.03 \times 400 = \$412.00$$

Online process of forms:

$$\$12.32/60 \text{ mins} = \$.205 \text{ a min} \times 3 \text{ mins} + \$0.61 \times 3,700 = \$2,257.00$$

(2) DD Form X561 (90% are expected to be completed online)

Manual processing:

$$\$12.32/60 \text{ mins} = \$.205 \text{ a min} \times 10 \text{ mins} + \$2.05 \times 300 = \$615.00$$

Online process of forms:

$$\$12.32/60 \text{ mins} = \$.205 \text{ a min} \times 5 \text{ mins} + \$1.03 \times 2,700 = \$2,781.00$$

Annualized Contractual, Equipment, and Printing costs:

Estimates are based on 4,000 total annual respondents. Four thousand will initially complete the DD X558 or its online parallel. Ninety percent are assumed to be completed online, so Mailing 1 represents 10% of the total estimated, which is 400. All applicants (3,000 estimated) will always receive Mailing 2 for issuance of the control number, password, and the second phase of the application. Given the initial 400 mailings and 3,000 to follow-up, the NLSC expects a total of 3,400 mailings. Each mailing will have a postage-paid and self-addressed envelope. Therefore, the NLSC estimates there will be a total of 6,800 postage-paid envelopes.

Mailing 1: Cover Letter, DD Form X558

Mailing 2: Cover Letter, DD Forms X559, X560, and X561

Stationery Contract: \$5,600.00

Post Office Mailbox Contract: \$135.00

Metered Mailing Equipment Rental: \$250.00

Metered Mailing Postage: \$6,600.00

*Mailing 1: .75*800 (400 Responses plus 400 return envelopes) = \$600.00*

*Mailing 2: 1.00*6000 (3000 Responses plus 3000 return envelopes) = \$6,000.00*

Print (Four Documents and two Cover Letters): \$5,500.00

Total annualized costs: 5,600+135+250+6,600+5,500 = \$18,085.00

15. Changes in Burden

Increase in burden is due to a new information collection.

16. Publication Plans/Time Schedule.

Date	Action
4/19/07	GDIT Awarded Contract for NLSC
5/07-2/08	Phase 1: Develop an operational plan to establish NLSC.
5/07-2/08	Task 1: Defining the Organizational Approach. Determine the appropriate organization structures required for administering the Pilot.
	6/01/07: Plan Proof of Principle Plan / CONOPS
	8/16/07: Results of Proof of Principle
	12/14/07: NLSC CONOPS Final Plan
5/07-12/07	Task 2: Develop National Marketing and Recruitment Plan. Develop a comprehensive plan for marketing and successfully identifying and recruiting members.
	11/14/07: Final Marketing and Recruiting Plan
5/07-1/08	Task 3. Develop Language Proficiency Certification Process. Develop a comprehensive and multi-stage plan for certifying the language proficiency of applicants.
	12/14/07: Final Language Proficiency Certification

Date	Action
	10/15/08: Report on Language Proficiency Certification Process -- Results and Recommendations
1/08-5/10	Phase 2: Establish a functioning Pilot NLSC
5/07-5/09	Task 4. Develop NLSC Compensation Plan. Working in close coordination with recognized experts in human resource planning and federal benefits and compensation programs, develop a compensation plan for NLSC Members. 1/11/08: Preliminary Compensation Plan 4/21/09: Compensation Plans Final
10/07-5/09	Task 5. Develop NLSC Contract Documents. 2/12/08: Preliminary NLSC Contract for members
	Task 6. Develop 24/7 Language and Communications Support Center. Develop and implement a plan for a cost-effective web-based approach to providing support to Members that provides opportunities for language skill maintenance and enhancement, as well as approaches to communicate with other Members. 6/17/08: Plan for 24/7 Language and Communications Support Draft 10/15/08: Final Plan for 24/7 Language and Communication Support
1/08-5/10	Task 7. Recruit NLSC Members. Implement the plans developed in Tasks 1-4 and initiate a national recruitment effort to identify NLSC Pilot Members. 3/08: The following documents must be ready to mail to potential applicants to the NLSC: DD X558 National Language Service Corps Pilot Application National Language Service Corps Pilot Global Language Self-Assessment National Language Service Corps Pilot Detail Skill Self – Assessment National Language Service Corps Pilot Language Data Sheet 6/17/08: Report for Recruitment Efforts. Monthly Status Reports Required
5/08-10/09	Task 8. Pilot Activation Plans. Develop a series of plans for no fewer than 3 activations of NLSC Pilot Members. 9/15/08: Preliminary Plans for Activation Exercises 2/12/09: Final Plans for Activation Exercises
2/09-2/10	Task 9. Activation Exercises. These 3 activation exercises must mirror all aspects of a fully functioning NLSC.

Date	Action
8/07-11/09	5/18/09: Report on Activation Exercises Task 10. Legislative Requirements for Permanent NLSC. Develop the requirements for legislation that will establish a permanent Language Corps. 4/11/08: Preliminary Report of Legislative Requirements for Permanent NLSC 11/14/08: Legislative Requirements for Permanent Corps Draft 2/12/09: Legislative Requirements for Permanent Corps Final
2/08-5/10	Task 11. Plan for Fully Operational NLSC. Provide a comprehensive plan for a fully implemented NLSC based on all lessons learned from the effort. 2/12/10: Preliminary Report on Fully Operational Corps 3/14/10: Final Report on Fully Operational Corps

17. Approval Not to Display Expiration Date.

The approval not to display expiration date is not being sought.

18. Exceptions to the Certification Statement.

There are no exceptions to the Certification Statement.

B. COLLECTION OF INFORMATION EMPLOYING STATISTICAL METHODS

Statistical methods are not employed for collection of this information.