SUPPORTING STATEMENT APPLICATION FOR APPOINTMENT IN THE NOAA COMMISSIONED OFFICER CORPS OMB CONTROL NO. 0648-0047

A. JUSTIFICATION

This request is for renewal/revision: two essay questions have been added to the application, and all applicants are now required to complete an interview.

1. Explain the circumstances that make the collection of information necessary.

The National Oceanic and Atmospheric Administration (NOAA) Commissioned Officer Corps (NOAA Corps) is the uniformed service of NOAA, a bureau of the Department of Commerce. The NOAA Corps provides a cadre of professionals trained in engineering, earth sciences, oceanography, meteorology, fisheries science, and other related disciplines who serve their country by supporting NOAA's mission of surveying the Earth's oceans, coasts, and atmosphere to ensure the economic and physical well-being of the Nation.

The statutory authority for this information collection is <u>33 USC Chapter 43</u>, National Oceanic and Atmospheric Administration Commissioned Officer Corps. NOAA Corps officers serve under Senate-confirmed appointments and Presidential commissions. The current authorized end strength of the NOAA Corps is 321 commissioned officers on the active duty list. Officers may resign their commissions, or may request voluntary retirement when eligible. Each resignation or retirement creates a vacancy on the list of active duty officers. Additionally, legislation is in place (via the Hydrographic Services Improvement Act) to begin increasing the authorized strength of the NOAA Corps to 379 starting in Fiscal Year 2010. A regular recruiting effort is required to simply maintain the strength of the NOAA Corps. To increase the number of qualified commissioned officers in upcoming years, an even greater recruiting effort will be necessary.

The collection of appropriate personal, educational, and professional qualifications information is critical in order to identify those applicants with the educational background, intelligence, high moral standards, and strong leadership potential required to serve the Nation as a member of this uniformed service.

2. Explain how, by whom, how frequently, and for what purpose the information will be used. If the information collected will be disseminated to the public or used to support information that will be disseminated to the public, then explain how the collection complies with all applicable Information Quality Guidelines.

Application information may be submitted on a year round basis, but the primary periods of collection are immediately preceding summer and winter college graduations. This information is used by the NOAA Commissioned Personnel Center to assess whether an applicant meets or exceeds the statutory minimum appointment qualifications and other legal obligations of citizenship. Completed applications are examined by the NOAA Officer Personnel Board in

order to rate and/or assess the level of qualification, suitability, and availability of candidates for appointment.

The expiring application consisted of three forms (56-42, 56-42A, and 56-42D), but the proposed revisions reduce this collection to two forms (56-42, a combination of the former 56-42 and 56-42A (instructions) and 56-42A, formerly 56-42D). This proposal is the result of efforts to reduce paperwork, clarify the collection process and improve the quality of applicant responses.

As explained in the preceding paragraphs, the information gathered has utility. The NOAA Corps Commissioned Personnel Center will retain control over the information and safeguard it from improper access, modification, and destruction, consistent with NOAA standards for confidentiality, privacy, and electronic information. See response to Question 10 of this Supporting Statement for more information on confidentiality and privacy. The information collection is designed to yield data that meet all applicable information quality guidelines. Although the information collected is not expected to be disseminated directly to the public, results may be used in scientific, management, technical or general informational publications. Should the Director, NOAA Corps decide to disseminate the information, it will be subject to the quality control measures and pre-dissemination review pursuant to Section 515 of Public Law 106-554.

3. <u>Describe whether, and to what extent, the collection of information involves the use of automated, electronic, mechanical, or other technological techniques or other forms of information technology.</u>

The primary means of information gathering is through fillable electronic forms that are downloaded from the NOAA Corps website. Paper forms are available upon request. Currently, forms must be printed, signed, and submitted in hard copy due to a lack of infrastructure to support secure digital submissions.

4. Describe efforts to identify duplication.

This is a unique application and there is no duplication with other efforts.

5. <u>If the collection of information involves small businesses or other small entities, describe</u> the methods used to minimize burden.

N/A.

6. <u>Describe the consequences to the Federal program or policy activities if the collection is not conducted or is conducted less frequently.</u>

The information collected is used for identifying both minimum eligibility and level of qualification of applicants for the NOAA Corps. Reducing or eliminating this collection would severely hinder the ability of the NOAA Corps to recruit officer candidates with the educational background, intelligence, high moral standards, and strong leadership potential required to serve the Nation as a member of this uniformed service.

7. Explain any special circumstances that require the collection to be conducted in a manner inconsistent with OMB guidelines.

None.

8. Provide information on the PRA Federal Register Notice that solicited public comments on the information collection prior to this submission. Summarize the public comments received in response to that notice and describe the actions taken by the agency in response to those comments. Describe the efforts to consult with persons outside the agency to obtain their views on the availability of data, frequency of collection, the clarity of instructions and recordkeeping, disclosure, or reporting format (if any), and on the data elements to be recorded, disclosed, or reported.

A Federal Register Notice published on February 4, 2009 (74 FR 6016) solicited public comment on this collection. No comments were received.

9. Explain any decisions to provide payments or gifts to respondents, other than remuneration of contractors or grantees.

None.

10. <u>Describe any assurance of confidentiality provided to respondents and the basis for assurance in statute, regulation, or agency policy.</u>

This information collection is a Privacy Act Systems of Records, <u>COMMERCE/NOAA-1</u>, <u>Applicants for the NOAA Corps</u>. <u>The Privacy Act of 1974</u>, 5 U.S.C. § 552a, is the statutory authority for confidentiality of this information collection, and assurance of confidentiality citing this authority is provided on the information collection forms.

11. <u>Provide additional justification for any questions of a sensitive nature, such as sexual behavior and attitudes, religious beliefs, and other matters that are commonly considered private</u>.

None.

12. Provide an estimate in hours of the burden of the collection of information.

Estimated total burden hours to the public has been increased by 1,245% due to: 1) a recent increased number of applicants and the expectation of further increases with the hiring of an additional recruiting officer, 2) the addition of two essay questions to NOAA Form 56-42,

- 3) underestimation of time required to complete the previous version of the form and
- 4) procedural changes that now require all applicants to complete an interview.

Estimated Total Annual Burden Hours: 2475

300 applications x 2 hours/applicant for paperwork = 600 hours

300 applications x 5 hours/applicant for interviewing = 1500 300 applications x 5 references x 15 minutes/reference = 375 hours.

13. Provide an estimate of the total annual cost burden to the respondents or record-keepers resulting from the collection (excluding the value of the burden hours in Question 12 above).

Estimated total annual cost to the public has increased by 340% due to an increased number of applicants, increased postage costs, and previously omitted costs for travel.

Estimated Total Annual Cost to Public: \$21,750

300 applicants x \$10/applicant postage or delivery charge = \$3,000 300 applicants x \$10/applicant college transcripts = \$3,000 300 applicants x \$50/applicant transportation to interview = \$15,000 1500 references x \$0.50/letter postage or delivery charge = \$750.

14. Provide estimates of annualized cost to the Federal government.

Excluding salaries for NOAA personnel, which have been accounted for elsewhere, additional costs pertaining specifically to this application process include travel for Officer Personnel Board members to attend board meetings.

Total annualized cost for recruiting/selection effort: \$6,000.00

Salaries for NOAA personnel (accounted for elsewhere) = \$0.00 Officer Personnel Board member travel (2 meetings/year) = \$6,000.00

15. Explain the reasons for any program changes or adjustments reported in Items 13 or 14 of the OMB 83-I.

Significant changes have been made to both estimated total burden hours and estimated total cost to the public.

Estimated total burden hours to the public have been increased by 1,245 percent. This increase reflects two adjustments and two program changes:

Adjustments: a trend of increasing numbers of applicants as well as increased recruiting efforts, and correction of the underestimation of time required to complete the previous version of the form

Program changes: the addition of two essay questions to NOAA Form 56-42, 3), as well as a requirement that all applicants to complete an interview.

Estimated total annual cost to the public has been increased by 340 percent. This is also a reflection of the trend of increasing numbers of applicants and increased recruiting efforts. It also accounts for a general increase in postage costs, and costs for each applicant's travel (this

last related to the program change, the requirement to complete an interview with an appropriate NOAA Corps officer).

16. <u>For collections whose results will be published, outline the plans for tabulation and publication.</u>

N/A.

17. <u>If seeking approval to not display the expiration date for OMB approval of the information collection, explain the reasons why display would be inappropriate.</u>

N/A.

18. Explain each exception to the certification statement identified in Item 19 of the OMB 83-I.

N/A.

B. COLLECTIONS OF INFORMATION EMPLOYING STATISTICAL METHODS

This collection does not employ statistical methods.