

## SUPPORTING STATEMENT

for

OMB 0704-0173, Record of Military Processing – Armed Forces of the United States,  
(DD Form 1966)

### A. JUSTIFICATION

#### 1. Need for Information Collection

Title 10 U.S. Code, Sections 504, 505 and 12102 and Title 14 U.S. Code and Sections 351 and 632 (Atch 1) require applicants to meet standards for enlistment into the Armed Forces. This information collection is the basis for determining eligibility of applicants for enlistment in the Armed Forces and is needed to verify data given by the applicant and to determine his/her qualification of enlistment. The information collected aids in the determination of qualifications, term of service, and grade in which a person, if eligible, will enter active duty or reserve status.

#### 2. Use of Information

The primary purpose of this information collection is to gather the necessary data for determining eligibility in the Armed Forces and for establishing personnel records on those enlisted. The DD Form 1966, "Record of Military Processing – Armed Forces of the United States," associated with this information collection, is used to gather necessary information (Atch 2).

The Military Services and the Coast Guard will use these data to reduce premature discharges by determining applicant eligibility for enlistment. The DD Form 1966 is completed by the applicant and assisted by a Service recruiter, after an oral interview. The information is collected and processed within a 1-2 day period. The information collected accompanies the applicant throughout the enlistment process at the Military Entrance Processing Stations (MEPS). The data collected assists recruiters in determining whether applicants meet the necessary entrance standards for enlistment in the Armed Forces.

#### 3. Improved Information Technology

The Department of Defense has determined that the DD Form 1966 is appropriate for electronic generation. The form is available on the DoD Electronic Forms Web site in a Fillable Adobe PDF file and used by the Military Entrance Processing Command (MEPCOM) Integrated Resource System (MIRS) at the MEPS. Recruiting stations able to use the form electronically will reduce the burden for not only the respondent, but for the recruiter as well. The MEPS has loaded the DD Form 1966 into the MEPCOM Integrated Resource System (MIRS) to enable the respondents the ability to electronically complete this form. Strategic planning has led to research and development for ongoing initiatives, including biometrics, towards the creation of an integrated system between the armed services and other agencies to share data electronically. This improvement will lessen the burden on moving paper between agencies and will ensure better accuracy of data. Progress of this on-going initiative is contingent upon funding availability.

4. Efforts to Identify Duplication

A review by military recruiting representatives resulted in no findings of duplicate information, records, or reporting. No similar information or verification procedure exists that can be used for this information collection. Data collected on the DD Form 1966 provides a wide range of demographic information needed to establish eligibility for enlistment in the Armed Forces. No culmination of data from other sources would provide the necessary information for enlistment.

5. Methods Used to Minimize Burden on Small Entities

Small businesses and other small entities will not be affected by this collection.

6. Consequences of Not Collecting the Information

Information is collected only once per applicant. If collection were stopped, ability to make determinations for enlistment into the military would be hampered.

7. Special Circumstances

This collection of information is not conducted under special circumstances; the respondent is asked to complete one form, one time. The information is used only for enlistment purposes by the Department of Defense. No requirements are placed on the respondent after providing the information and the personal information collected is kept confidential to the qualification process and the individual's military records. 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

The 60-day Federal Register Notice announcing this information collection (as required by 5 CFR 1320.8(d)) was published in *Vol. 74, No. 215, Monday, November 9, 2009, Federal Register, Number 215, page 57665* (Atch 3). No public comments were received in response to the notice. This information collection was also reviewed by designated representatives from each Service Department Headquarters and Recruiting Commands.

Per Terms of Clearance under Notice of OMB Action (NOA), dated 06/15/2010 (Atch 3), the submission of another 60-day FRN is not required. With this second OMB submission, the Privacy Act Statement for the DD Form 1966 was revised to include Routine Uses. Links to the PIAs and SORNs are now listed in block 11 of the Supporting Statement.

9. Payments to Respondents

No payments, gifts, or guarantees are made to respondents who provide this information.

10. Assurance of Confidentiality

This information collection does not ask the respondents to submit proprietary,

trade secret or confidential information to the Department.

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

Personal Identifying Information (PII): Respondents are advised that their data are for OFFICIAL USE ONLY and will be maintained and used in strict confidence in accordance with Federal law and regulations and that those procedures are in place to protect the confidentiality of the information. The paper forms will be secured to protect PII in accordance with DoD regulations. The erroneous release of PII might cause legal action from individuals against DoD and/or the government.

Protection of the Information: Records are maintained in secure, limited access, or monitored areas. Physical entry by unauthorized persons is restricted through the use of locks, passwords, or other administrative procedures. Access to personal information is limited to those individuals who require the records to perform their official assigned duties.

Social Security Number (SSN): Is requested to ensure accuracy of data involving the specified individual applicant. The SSN is obtained and stored in the initial record (personnel, finance, medical, and security) for proofing, vetting, and maintaining unambiguous identity for U.S. persons. With the SSN being used for personal identification in major DoD human resource systems (personnel, finance, and medical), it remains the only unique identifier that ensures the accuracy across all the systems for proper data retrieval. An applicant's SSN is used to keep all records together during the enlistment process.

Sensitive Questions (i.e. gender, race and ethnicity): Responses regarding gender are requested to determine the total number of male and female applicants. Character and social adjustment questions, Question 24 -26, on DD Form 1966 are required to preclude the enlistment of unsuitable persons into the U.S. Armed Forces who may be a detriment to the preparedness of the military and the security of the United States. This information is used by the Services to determine applicant eligibility for enlistment. The questions are preceded by the following: If "Yes," explain in Section VI, "REMARKS."

Data collected on race and ethnicity are used throughout the application process as a means of validating the applicant's identity. The revised standards, per OMB Bulletin No.00-02, Guidance on Aggregation and Allocation of Data on Race for Use in Civil Rights Monitoring and Enforcement, [http://whitehouse.gov/omb/bulletins\\_b00-02/](http://whitehouse.gov/omb/bulletins_b00-02/), (Atch 4), provides the recruiters with the necessary information to assist the applicants with properly completing the race and ethnicity blocks on the DD Form 1966. Religious preference information is voluntary, but is requested to determine the proper mix of chaplains in each Service. Marital status is used to determine appropriate pay and benefits. It is also used to determine the number of dependents, obligations and financial suitability of the applicant.

PIA: The Privacy Impact Assessments (PIA) identified in the DoD DITPR database, as containing the DD Form 1966, are found on-line at the following URLs:

Army: <http://ciog6.army.mil/PrivacyImpactAssessments/tabid/71/Default.aspx>

Navy: <http://www.doncio.navy.mil/contentview.aspx?id-678>

USAF: <http://www.privacy.af.mil/pia/index.asp>

SORNs: The following System of Records Notice (SORNs) oversees the collection of the SSN for the DD Form 1966. Completed forms are covered by recruiting and official military personnel files. SORNs are maintained by each of the Services. The DoD Blanket Routine Uses, accessed at [http://privacy.defense.gov/blanket\\_uses.shtml](http://privacy.defense.gov/blanket_uses.shtml), applies to this collection.

Applicable SORNs:

Accession:

Army (<http://privacy.defense.gov/notices/army/A0601-210c-TRADOC.shtml>)

Navy (<http://privacy.defense.gov/notices/usn/N01133-2a.shtml>)

Marine Corps (<http://privacy.defense.gov/notices/usmc/M01133-3.shtml>)

Air Force (<http://privacy.defense.gov/notices/usaf/F036AFRESB.shtml>)

Coast Guard (<http://edocket.access.gpo.gov/2008/E8-29845.htm>)

Official Military Personnel Files:

Army ([http://privacy.defense.gov/notices/army/A0600-8-104\\_AHRC.shtml](http://privacy.defense.gov/notices/army/A0600-8-104_AHRC.shtml))

Navy (<http://privacy.defense.gov/notices/usn/N01070-3.shtml>)

Marine Corps (<http://privacy.defense.gov/notices/usmc/M01070-6.shtml>)

Air Force (<http://www.defenselink.mil/privacy/notices/usaf/F036AFPCC.shtml>)

Coast Guard (<http://edocket.access.gpo.gov/2008/E8-29793.htm>)

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

a. Response Burden:

(1) DD Form 1966

Total annual respondents:	510,000
Frequency of response:	1
Total annual responses:	510,000
Burden per response:	20 minutes
Total burden hours:	170,000

b. Explanation of How Burden was Estimated. An observed average of 20 minutes is taken to complete the six-page form, estimated by a recruiter observing and working with an applicant filling out the form.

c. Labor Cost to Respondents. There is a labor cost to the respondent to fill out this form.

510,000 respondents at \$7.25hr\* at 20 minutes per form = \$1,232,500.

\*Hourly rate based on U.S. Department of Labor federal minimum wage.

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 set up cost associated with this information collection.

b. Operation and Maintenance Cost. There are no operational or maintenance costs associated with this information collection.

14. Estimates of Cost to the Federal Government

a. Work load requirements.

1. E-5 / E-7 recruiter processes form. Estimated completion time is 20 minutes.

2. GS-06/Step 03 reviews only page 1, to determine completeness of the responses. Estimated completion time is 5 minutes.

b. Estimated Costs:

1. E-5 / E-7 hourly pay = \$15.08 at 20 minutes/form	\$5.03
2. GS-06/ Step 03 hourly pay = \$15.40 at 3 minutes/form	\$1.28
3. Printing (from MIRS) at .10 cents per form	\$1.10
4. Cost to the Federal Government per respondent	\$6.41
Total Federal Government costs (510,000 X \$6.41)	\$3,269,100

15. Changes in Burden

There are no changes in burden for this information collection.

16. Publication Plans/Time Schedule

Results of this information collection will not be published.

17. Approval Not to Display Expiration Date

Approval not to display the expiration data 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 this collection of information.