

SUPPORTING STATEMENT
For
OMB 0704-0006, Request for Verification of Birth, (DD Form 372)

A. JUSTIFICATION

1. **Need for Information Collection.**

Title 10, U.S. Code, Section 505, establishes minimum and maximum age standards for enlistment in the Armed Forces and the Coast Guard, and Title 10, U.S. Code Sections 532, 3253, 5013, and 8253 establish citizenship requirements. This information collection is needed and required to determine age qualification and support applicant's claims of citizenship status for enlistment when the individual applicant cannot provide proof of birth, such as birth certificate.

2. **Use of Information.**

The primary purpose of this information is for birth verification, 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. The verification, in turn, enables the Department of Defense (DoD) to ensure applicants meet citizenship requirements for enlistment into the Armed Forces including the Coast Guard.

The form associated with this information collection is the DD Form 372, "Request for Verification of Birth.". When an applicant is unable to provide a birth certificate, military recruiters use the DD Form 372 to verify the data for enlistment eligibility. The respondents include state and local agencies, primarily the Bureaus of Vital Statistics, which provide 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. This information may be collected in paper copy, via faxes or e-mails of scanned completed forms.

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.**

The Department has determined that the DD Form 372 is appropriate for electronic generation. The form is available on the DoD Electronic Forms Website in Fillable Adobe PDF files and used by the Military Entrance Processing Command (MEPCOM) Integrated Resource System (MIRS) at the Military Entrance Processing Stations (MEPS). The initial completion of applicant's information occurs electronically at the recruiting station. Recruiters will electronically produce the form and enter the appropriate data before obtaining birth verification data from applicants. However, full implementation of electronic transmission and digital signatures, as required under the GPEA, is not yet possible due to the unavailability

of electronic connections (standardized hardware and/or software) between Federal and state/local government agencies at this time. Strategic planning has occurred and research and development has begun on ongoing initiatives, including biometrics. Printed forms must be generated until ongoing initiatives are implemented. The use of faxes and e-mails (with a scanned copy of the DD Form 372 as an attachment) to transmit the completed/signed forms is encouraged and accepted. Progress is contingent upon funding of these ongoing initiatives.

The MIRS system (USMEPCOM primary system) has been identified as a legacy system for the Virtual Interactive Processing System (VIPS). Modernization and upgrades (that is beyond maintenance) to MIRS is not authorized by HRM. The Investment Review Board (IRB) is charged with certifying funds for modernization. NDAA FY05 requires all DoD business systems be certified prior to allocating future investment funds. The objective of the IRB processes is to ensure that business systems investment align with our strategic mission and goals. The certification is to ensure that systems are not making investments in legacy applications and systems that will not provide return on investments.

Currently all the Services are undergoing major system transformation in order to comply with the GPEA's guidance regarding electronic transmission and systems interface. The Services systems will interface with VIPS, thus creating a major change on how data is transmitted and stored.

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 businesses or other small entities.

6. Consequences of Not Collecting the Information.

If collection of information ceased, the ability to meet determination for enlistments, as required by law for birth verification and citizenship requirements, could not be met.

7. Special Circumstances.

This collection of information is not conducted under special circumstances; the respondent is asked questions by the recruiter and the form is completed one time. The information is utilized for none other than 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 record. 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. 75, No. 247, Monday, December 27, 2010, Federal Register, pages 81237-81238. No public comments were received in response to the notice. Consultations were conducted with designated representatives from each Service Department Headquarters and Recruiting Commands.

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 respondent to submit proprietary, trade secret, or confidential information to the Department.

11. Personally Identifiable Information, Sensitive Questions, Protection of the Information, PIA and SORNs.

The DD Form 372 provides agencies with sufficient information for birth verification, 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.

Personally Identifiable Information (PII): Respondents are advised that their data are FOR OFFICIAL USE ONLY and will be maintained and used in accordance with Federal law and regulations and those procedures are in place to protect 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): In previous versions of this form there was a block for the SSN and a Privacy Statement. During a forms review in 2007, Mr. Dave Henshall/WHS/ESD, determined that “this form does not need a Privacy Act Statement since the information is not collected directly from the individual. Instead it is extracted and thereby populated using information contained on DD Form 1966, by the recruiter.” Furthermore, with

the advent of the P&R DTM-DoD Social Security Number (SSN) Reduction Plan, the SSN block was also deleted.

Sensitive Questions (i.e. race and ethnicity): Data collected on race and ethnicity are not required for this form.

PIA: Per Mr. Gary Evans, DoD-CIO, the MIRS PIA is the associated PIA for this collection, though the DD Form 372 is not actually listed in the PIA, until VIPS comes online and a PIA is created for VIPS.

SORNs:

a. Army (<http://privacy.defense.gov/notices/army/A0601-210c-TRADOC.shtml>)
United States Army - Army Recruiting Prospect System (September 11, 2008, 73 FR 52843) (A0601 – 210c TRADOC) / Enlisted Eligibility Files (December 8, 2005, 70 FR 72998) (A0601 – 210a USAREC)

b. Air Force (<http://privacy.defense.gov/notices/usaf/F036AFRESB.shtml>)
United States Air Force - Recruiters Automated Management System (RAMS) (June 11, 1997, 62 FR 31793) (F036 AFRES B)

c. Navy (<http://privacy.defense.gov/notices/usn/N01133-2.shtml>)
United States Navy - Recruiting Enlisted Selection System (N01133-2)

d. Marine Corps (<http://privacy.defense.gov/notices/usmc/M01070-6.shtml>)
United States Marine Corps - Individual Recruiter Training Record (February 22, 1993, 58 FR 10630) (M01070-6)

e. Coast Guard (<http://edocket.access.gpo.gov/2008/E8-29845.htm>)
United States Coast Guard - The Privacy Act of 1974 (5 U.S.C. 552a) / United States Coast Guard (027 Recruiting Files System of Records).

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 372

Total annual respondents:	140,000
Frequency of response:	1
Total annual responses:	140,000
Burden per response:	.082 hour
Total burden hours:	11,480 hours

b. Explanation of How Burden was Estimated. Burden estimate of .082 hour (5 minutes) was verified by the Joint Forms Committee and prior estimates for use of this form.

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

this form or to manually annotate the date on the form from law enforcement agencies' card files or process computer copies of the data. The requirement estimated for a clerk to look up the information on a computer screen and print out the information and send out the form has been estimated at:

$$\begin{aligned} \$17.49/\text{hr.} \times .082 \text{ hours} &= \$1.44 \text{ per form.} \\ 140,000 \text{ respondents at } \$1.44 &= \$201,600. \end{aligned}$$

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

a. Total Capital and Start-up Cost. There is no capitol or set up cost associated with this information collection. Respondent will utilize systems currently in place to identify data requested not only from the government but other public and private agencies.

b. Operation and Maintenance Cost. Of the 140,000 DD Forms 372, "Request for Verification of Birth" there is no cost to the applicants who complete this form.

14. Estimates of Cost to the Federal Government.

a. Work load requirements.

1. E-5 / E-7 hourly pay = \$15.59 at 15 minutes/form	\$3.90
2. Cost to mail form	\$.44
Cost to the Federal Government per respondent	\$1.44
Total Federal Government costs (140,000 X \$5.78)	\$809,200

15. Changes in Burden.

The increase in estimated burden hours is due to additional recruiting requirements due to the increase in recruiting missions of the Armed Services. Increase in cost is an adjustment to correct mathematic/computation error in previous reporting.

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.