SUPPORTING STATEMENT

Title of Information Collection: 0704-0173
Record of Military Processing – Armed Forces of the United States
DD Form 1966 and Request for Examination USMEPCOM Form 630-3A-E.

A. JUSTIFICATION

1. Need for Information Collection

Title 10 U.S. Codes, Sections 504, 505, 508, and 1012, Title 14, U.S. Code, Sections 351 and 632; and Title 50 U.S. Code, Appendix Section 451, and EO 9397 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. <u>Use of Information</u>

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 USMEPCOM Form 680-3A-E is the applicant authorization to release medical information to the Military Entrance Processing Station (MEPS) to begin the process required to meet enlistment qualifications. The DD Form 1966 is the main source document for military enlistment or continued military service records. The information collected is used to feed other DoD and service –specific forms that later would be used to issue identification cards and receive benefits associated with military service.

The Military Services and the Coast Guard will use these data to reduce premature discharges by determining applicant eligibility for enlistment. The information collected on USMEPCOM Form 680-3A-E is transferred electronically into the DD form 1966 after the applicant meets enlistment standards and decides to enlist. The DD Form 1966 is completed by the applicant and assisted by a Service recruiter. The information is collected and processed within a one – to two – day period. The information collected accompanies the applicant throughout the enlistment process at the MEPS.

The data collected has assisted recruiters in determining whether applicants meet the necessary entrance standards for enlistment in the Armed Forces.

As with civilian applications, incomplete or false self-disclosure is not punishable by law, but findings of falsifying information may lead to voiding of the contract.

3. <u>Improved Information Technology</u>

The Department has determined that the forms are appropriate for electronic generation. The DD Form 1966 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 MEPS. All military service systems are formatted to access the information from the forms necessary for processing into the Services. 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. Specifically, the applicant does not complete the forms hard copy on his/her own, but rather the recruiter and the applicant complete the forms together: the applicant answers the questions on the forms by the recruiter and the recruiter enters in the information into the electronic versions. The recruiters are trained on the forms and fully understand the required criteria of the questions. The forms are then signed with biometric signatures per DoD policies. 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. <u>Efforts to Identify Duplication</u>

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 and USMEPCOM Form 680-3A-E provide 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. The USMEPCOM Form 680-3A-E had been submitted to, and cleared by, OMB as Control Number 0704-0468, but the form is now being included in the revision to the current submission, 0704-0173. OMB Control Number 0704-0468 will not be revised.

5. <u>Methods Used to Minimize Burden on Small Entities</u>

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

6. <u>Consequences of Not Collecting the Information</u>

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

7. <u>Special Circumstances</u>

This collection of information is not conducted under 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

The 60-day Federal Register Notice announcing this information collection, as required by 5 CFR 1320.8(d), was published on 06/04/14 in Vol. 79, No. 107, page 32238. No

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 with no comments.

The 30-day Federal Register Notice was published on 07/31/14 in Vol. 79, No. 147, page 44421.

9. <u>Payments to Respondents</u>

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

10. <u>Assurance of Confidentiality</u>

Respondents are advised that statements will be held in strictest confidence and procedures are in place to protect the privacy of the information to the extent permitted by law. The forms are maintained in personal records and are seen only by individuals who have a need to verify information contained on the form. The paper forms will be secured to protect Personally Identifiable Information (PII) in accordance to DoD regulations. 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. A Privacy Act Statement is included in both forms.

11. <u>Personal Identifying Information, Sensitive Questions, and Protection of the</u> 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 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.

Character and social adjustment questions, Question 24 through 26 on DD Form 1966, are required to preclude the enlistment of unsuitable people into the U.S. Armed Forces who may be a detriment to the preparedness of the military and the security of the Unites 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".

Sensitive Questions (i.e. race and ethnicity): Data collected on race and ethnicity is 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/ 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. Responses regarding gender are also requested to determine the total number of male and female applicants. Social Security Number (SSN) is requested to ensure accuracy of data on the specified individual applicant.

The DD Form 1966 is the genesis for the personnel record, the medical record, and the security records. The SSN is obtained and stored into the initial record (personnel, finance, medical, and security) for proofing, vetting, and maintaining unambiguous person 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 to ensure proper data retrieval. The paper forms will be secured to protect Personally Identifiable Information (PII) in accordance to DoD regulations. 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.

SORNS: The following System of Records Notice (SORNs) oversee the collection of the SSN for the DD Form 1966 and USMEPCOM Form 680-3A-E. Completed forms are covered by recruiting and official military personnel SORNS maintained by each of the Services. The DoD Blanket Routine Uses found at http://dpclo.defense.gov/privacy, apply to this collection. Applicable SORNs:

Army: http://dpclo.defense.gov/Privacy/SORNsIndex/DODwideSORNArticleView/tabid/6797/Article/6150/a0601-210a-usarec.aspx

Air Force: http://dpclo.defense.gov/Privacy/SORNsIndex/DODwideSORNArticleView/tabid/6797/ Article/5811/f036-aetc-f.aspx

Marine Corps: http://dpclo.defense.gov/Privacy/SORNsIndex/DODwideSORNArticleView/tabid/6797/Article/6777/m01133-3.aspx

Navy: http://dpclo.defense.gov/Privacy/SORNsIndex/DODwideSORNArticleView/tabid/6797/Article/6413/n01133-2.aspx

Coast Guard:

http://www.gpo.gov/fdsys/pkg/FR-2011-08-10/html/2011-20225.htm

- 12. <u>Estimates of Annual Respondent Burden and Labor Cost f to the</u> Respondent for Collection of Information.
 - a. Respondent Burden:
 - 1) DD Form 1966:
 - a. Annul Burden Hours: 141,000 hours

b. Number of Respondents: 423,000

c. Responses Per Respondent: 1

d. Total Annual Responses: 423,000

e. Average Burden Per Response: 20 minutes

2) USMEPCOM FORM 680-3A-E:

a. Annul Burden Hours: 155,100 hours

b. Number of Respondents: 423,000

c. Responses Per Respondent: 1

Total Annual Responses: 423,000

Average Burden Per Response: 22 minutes

Total Annual Burden Hours: 296,100 hours

Frequency: Per Applicant

- b. Explanation of How Burden was Estimated. An observed average to complete each form series, 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 forms.

DD Form 1966: 423,000 respondents at \$7.25hr* at 20 min per form = \$1,022,250.

USMEPCOM Form 680-3A-E: 423,000 respondents at \$7.25hr* at 22 min per form = \$1,124,475.

Total labor cost to the respondents: \$2,164,725

*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 capitol 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) Recruiter assists respondent with filling out each form. Estimated completion time:

DD Form 1966: 20 minutes

USMEPCOM Form 680-3A-E: 22 minutes

2) GS-06/Step 03 reviews the USMEPCOM Form 680-3A-E and page 1 of the DD Form 1966 to determine completeness of the responses. Estimated completion time is 3 minutes per form (6 mins total).

b. Estimated Costs (pay based on CAPE Full Cost of Manpower Tool):

1) E6 hourly pay = \$61.14 at

a. DD Form 1966: 20 minutes/form \$20.38b. USMEPCOM Form 680-3A-E: 22 minutes/form \$22.42

2) GS-06/ Step 03 hourly pay = \$31.84 at 6 minutes/form \$3.18

Total Federal Government costs (423,000 X \$45.98)

\$19,449,540

15. Changes in Burden.

The changes in burden since the previous OMB submission are a result of 1) a decrease in the number of respondents; that is, there has been a change in recruiting trends with less applicant flow for the recruiting mission. However, 2) there is an increase in labor cost of respondent burden because two forms (DD Form 1966 and USMEPCOM Form 680-3A-E) are now being included in the current information collection rather than only one (DD Form 1966) which was included in the previous submission.

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.