

**Supporting Statement for 0704-0190:  
Appointment of Chaplains for the Military Services - DD Form 2088 (Statement of  
Ecclesiastical Endorsement)**

**A. Justification**

**1. Need for Information Collection.**

Per Department of Defense Directive 1304.19 (DoDD 1304.19), "*Appointment of Chaplains for the Military Departments*," and Department of Defense Instruction 1304.28 (DoDI 1304.28), "*Guidance for the Appointment of Chaplains for the Military Departments*," in conjunction with 10 USC 532 and 12201, professionally qualified Religious Ministry Professionals shall be appointed as chaplains to provide for the free exercise of religion for all members of the military services, their dependents, and other authorized persons. Since World War I, the faith group that awarded them Religious Ministry Professional status has endorsed the professional qualifications of Religious Ministry Professionals. Religious Organizations (RO) listed with the Department of Defense are required to endorse or certify that Religious Ministry Professionals are fully qualified to serve as chaplains in the Armed Forces. No Religious Ministry Professional person may become a chaplain without this endorsement, and the loss of endorsement constitutes a loss of professional status.

This information collection is needed to ensure that religious faith groups are appropriately organized and authorized by their constituencies to endorse clergy for service as chaplains in the Military Services. It also certifies the number of years of professional experience for each candidate.

**2. Use of Information.**

The DD Form 2088, "*Statement of Ecclesiastical Endorsement*," is used on occasion, whenever an ecclesiastical endorsing agency submits a Religious Ministry Professional, as a candidate to become a chaplain. The ecclesiastical endorsing agency sends it to the Military Service, which the Religious Ministry Professional wishes to join.

The three Military Services are required by DoD Directive 1304.19, "*Appointment of Chaplains for the Military Departments*," and DoD Instruction 1304.28, "*Guidance for the Appointment of Chaplains for the Military Departments*," to obtain an endorsement of the professional qualifications of Religious Ministry Professionals applying for the chaplaincy. This endorsement is rendered in the form of an ecclesiastical endorsement from the Religious Ministry Professional's religious faith group. An ecclesiastical endorsement is an essential part of the application process for clergy to become chaplains. Both the military and the religious faith groups insist on ensuring that only professionally qualified Religious Ministry Professionals serve as chaplains. Without this formal process, the chaplaincy would cease to exist as a professional corps.

DD Form 2088, "*Statement of Ecclesiastical Endorsement*," is used to endorse that a Religious Ministry Professional is professionally qualified to become a chaplain. It requests information about name, address, professional experience, and previous military experience to be used in determining grade, date of rank, and eligibility for promotion for appointees to the chaplaincies of the armed forces.

DD Form 2088, "*Statement of Ecclesiastical Endorsement*," has been used by the three Military Services to ensure that those Religious Ministry Professionals who applied to become chaplains were professionally qualified and appropriately endorsed by their respective religious faith groups.

### **3. Improved Information Technology.**

Due to the increased use of advanced information technologies among the Chaplain Services and the ecclesiastical certifying agencies, the electronic medium of information exchange has been used more frequently. Since the fillable Adobe forms have become available, the respondents have begun to complete the form electronically. There is no requirement for ecclesiastical certifying agencies to possess the computers and software. Many small religious organizations are supported by tiny budgets sustained by offerings from just a few churches. These smaller organizations do not have financial resources to support internet or computer training, hardware, and software. Many of the larger ecclesiastical endorsing agencies plan to use computers and software as part of their customary business and for reasons other than to provide information or to keep records for the government. Because endorsement originates in organizations that typically have limited technology and the need to have a hard copy endorsement document, there is no practical or cost effective way to apply current information technology to all religious organizations for this collection process.

### **4. Efforts to Identify Duplication.**

No other government agency is responsible for this program. The three military chiefs of chaplains do not have any forms or information collection, which duplicate the information collected. There is no other way to collect this information.

### **5. Methods Used to Minimize Burden on Small Entities.**

Collection of this information does not involve small businesses.

### **6. Consequences of Not Collecting the Information.**

This information is collected only on occasion. If collections were stopped, the ability of the Department of Defense to establish eligibility for service as a military chaplain would cease to exist.

### **7. Special Circumstances.**

None of the special circumstances applies to this collection of information.

**8. Agency 60-Day Federal Register Notice and consultations outside of the Agency, Notice of OMB Action (NOA).**

A 60-day Federal Register Notice was published in the Federal Register on 08/29/14 in Volume 79, page 51561. No comments were received.

A 30-day Federal Register Notice was published in the Federal Register on 10/28/14 in Volume 79, page 64176.

Consultation with the ecclesiastical endorsing agents regarding this information collection is done each year at the annual meeting of the National Conference on Ministry to the Armed Forces (NCMAF). The forms and usage were reviewed by the following individuals of the military departments:

Army: CH COL Bryan Walker, ARMY OCCH  
Navy: CAPT James Denley, CHC, OPNAV  
Air Force: Mr. J. Creamer, AF\HCP

**9. Payments to Respondents.**

No payment or gift will be provided to respondent.

**10. Assurance of Confidentiality.**

This information becomes a part of the individual's military personnel file and is maintained by each Service and protected under the Privacy Act of 1974.

**11. Sensitive Questions, Social Security Number, Privacy Impact Assessment and Systems of Records Notices (SORNs).**

Sensitive Questions: There are no sensitive questions asked in this information collection.

Social Security Number (SSN): The Religious Ministry Professional or Chaplain's SSN is required on this form as it is the: 1) connection of the individual's religious organization to the individual's personnel military record; 2) the only individual personnel identifier used throughout the Department of Defense (DoD) that sufficiently allows the Chaplaincies to enter the data document in an applicant's file for accessioning; 3) used to do cross checks of the SSN on the DD Form 2088 with original documents provided in the application for the Chaplaincy. It verifies that individuals with the same or similar names are distinguished in the military records and record keeping with military personnel systems and that the correct endorsement certifies the specific chaplain. The SSN cannot be truncated without the risk of misidentifying the RMP or chaplain. There are no other known unique identifiers for this purpose.

Privacy Impact Assessments (PIAs): The Service PIAs are listed, as follows:

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

Navy: <http://www.doncio.navy.mil/uploads/EMPRS%20PIA.pdf>

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

Coast Guard: PIA would be with Department of Homeland Security, but DoD-CIO office states that there are no personnel systems published.

Systems of Records Notices (SORNs): The collection of data on this form is stored in the following Systems of Records Notices:

Accession SORNS:

<http://dpclo.defense.gov/Privacy/SORNsIndex/DODwideSORNArticleView/tabid/6797/Article/6148/a0601-100-ahrc.aspx>

<http://dpclo.defense.gov/Privacy/SORNsIndex/DODwideSORNArticleView/tabid/6797/Article/6411/n01131-1.aspx>

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

<http://dpclo.defense.gov/Privacy/SORNsIndex/DODwideSORNArticleView/tabid/6797/Article/5820/f036-aetc-r.aspx>

<http://edocket.access.gpo.gov/2008/E8-29845.htm>

Official Military Personnel Files:

<http://dpclo.defense.gov/Privacy/SORNsIndex/DODwideSORNArticleView/tabid/6797/Article/6131/a0600-8-104-ahrc.aspx>

<http://dpclo.defense.gov/Privacy/SORNsIndex/DODComponentArticleView/tabid/7489/Article/6405/n01070-3.aspx>

<http://dpclo.defense.gov/Privacy/SORNsIndex/DODwideSORNArticleView/tabid/6797/Article/6775/m01070-6.aspx>

<http://dpclo.defense.gov/Privacy/SORNsIndex/DODwideSORNArticleView/tabid/6797/Article/5876/f036-af-pc-c.aspx>

<http://edocket.access.gpo.gov/2008/E8-29793.htm>

## 12. Estimates of Response Burden and Annual Cost to the Respondent.

(a) Respondent Burden:

DD 2088

Total annual respondents:	520
Frequency of response:	2
Total Annual responses:	1,040
Burden per response:	45 minutes

Total Burden hours: 46,800/60 = 780 hours

\*A DD Form 2088 is required to be submitted by the Religious Organizations for each qualified individual.

(b) Explanation of How Burden was Estimated.

Average time to complete forms calculated by observing actual process and discussions with several endorsing agents at the Annual NCMAF Conference in Washington, DC. Twenty minutes was the average time per form, however, including time expended in information gathering and document copying the estimated time is forty-five (45) minutes per form.

The number Religious Organizations (ROs) who are qualified by DoDI 1304.28 to fill out this form is restricted to the approximately 200 RO endorsers of military chaplains. Based on the number of DD Form 2088's submitted in this past year, it is estimated that a total of 1,040 forms will be submitted from these ROs on an annual basis.

(c) Labor Cost to Respondent:

Hourly pay for endorsing agents/administrative staff = \$34.82.

DD Form 2088: 1,040 forms @ 45 minutes per form at an hourly rate of \$34.82 = \$27,160 (780 hours \* \$34.82).

**13. Estimates of Cost Burden to the Respondent for Collection of Information.**

Estimate of the Total Annual Cost Burden per Form

(a) Total capital and start-up cost component: There is no capital or start-up cost associated with this collection.

(b) Operational and maintenance cost: There are no operational or maintenance costs associated with this information collection.

**14. Estimated Annualized Cost to the Federal Government.-**

DD Form 2088:

Accessioning officers reviewing and processing the forms hourly pay \$31.50 X 10 minutes = \$5.25 per form

1,040 forms @ \$5.25 per form \$5,460.00

TOTAL ANNUAL COST: \$5,460.00

**15. Changes in Burden.**

The small changes in burden from the 2011 submission have to do with the difference in how burden was calculated. The number of applicants in 2011 was determined to be 1000 and with only a single form being processed per applicant. In 2014, we believe the number of applicants is more accurate and it is estimated that in the course of a year two forms for each applicant will be completed. The end result is only a small increase in estimated burden from the 2011 submission.

**16. Publication Plans/Time Schedule.**

The results for collection of this information will not be published.

**17. Approval Not to Display Expiration Date.**

Approval not to display an expiration date is not being sought.

**18. Exceptions to the Certification Statement.**

No exceptions to the certification statement are being sought.