A. <u>JUSTIFICATION</u>

1. <u>Need for the Information Collection</u>

The Joint Services Support (JSS) is an information system which provides event management, knowledge management, program-productivity, communication/collaboration/outreach, and dashboards and reporting solutions to Guard and Reserve offices at the *National Guard Bureau (NG)* and the *Center for Excellence, Yellow Ribbon Reintegration Program, Office of the Secretary of Defense-Reserve Affairs (CfE YRRP OSD-RA)* office, as well as their program offices across 54 states and territories.

JSS is mission-critical and the system of record for the congressionally-mandated YRRP. As such it manages, for the program the complete life cycle of concurrent events held nationwide for Service members and their families across the Guard and Reserve components. JSS helps YRRP maintain an event calendar, register and track event attendees, automate evaluations processing, captures after action reports, and ultimately generate necessary program metrics in order to produce the report to congress.

In addition to YRRP, JSS also mission essential to other participating Guard and Reserve programs, namely – NG Family Program, NG Employer Support Program, NG Financial Management Awareness Program, NG Sexual Assault Response and Prevention Program, SG's Psychological Health Program, and NG Warrior Support program (Transition Support). For these programs, JSS provides reporting capabilities to measure volunteer activities, virtual meeting functions, store/organize/share program information/resources/documents, reporting capabilities to measure Unit Family Readiness Group's (FRG) readiness status, self-serve eLearning modules on Guard and Reserve topics, communication tools, program contacts/resource finder, and myriad of reports specific to the programs participating in the JSS system.

Authority for maintenance of the system:

SEC. 582 of PUBLIC LAW 110-181. YELLOW RIBBON REINTEGRATION PROGRAM. 28 JANUARY 2008;
38 U.S.C. § 4301 – 4335. Uniformed Services Employment and Reemployment Rights Act (USERRA). 1994;
DoD Instruction 7730.54, 10 U.S.C. 10145 - READY RESERVE: PLACEMENT IN, 10 U.S.C.

12302 – READY RESERVE;
20 CFR Part 1002. Uniformed Services Employment and Reemployment Rights Act (USERRA). 1994;
Executive Order (E.O.) 9397 (SSN), as amended

2. Use of the Information

The information collected is primarily used to support the registration process for the system, event participation, and completion of civilian employer information (CEI). This is necessary to ensure activities are be associated against account holders for program management and support purposes. Examples of use of such information include, validating event registration and attendance, collecting CEI, enabling users to login to system to facilitate outreach and communication activities, enabling leadership across the participating programs, with oversight and reporting. The CEI function has already been developed in the system; however it has not been turned on at the time of this submission. Pending this OMB approval, the SORN may be published and the data exchange interface can be enacted. We would like to clear this submission with the CEI function as it will become operational when approval is gained.

3. Use of Information Technology

100% of collection occurs electronically.

4. Non-duplication

No, the information being collected does not currently exist elsewhere.

5. Burden on Small Business

Not applicable.

6. Less Frequent Collection

Reducing the collection frequency will cause non-compliance with the stated mandate. For example, Yellow Ribbon Reintegration Program (YRRP) events must occur in support of the deployment activity in any given state, including events that are to occur in 30, 60 and 90 day intervals post-deployment.

7. Paperwork Reduction Act Guidelines

Collection is conducted in adherence to 5CFR 1320.5(d)(2)

8. Consultation and Public Comments

A notice of the proposed collection was published in the Federal Register on June 4th, 2014 (79 FR 32238). This notice was open for public comment for 60 days. No comments were received.

Since the Yellow Ribbon Reintegration Program (YRRP) is in support of both, the Guard and Reserve communities, service components representing both military entities remain engaged in frequent consultations and meetings to ensure program objectives are met. This has been the case since the inception of the system to support the YRRP objectives.

9. Gifts or Payment

None.

10. Confidentiality

SORN ID number and title: INGB 004, "Joint Services Support System (JSS)"

Confidential information is safeguarded through the use of policies and procedures, as well as technologies, to ensure information is not accessed by any person or system other than for which the information is collected and stored.

The system uses secure sockets layer (SSL) technology to encrypt all PII information when in transit. In addition, a database-wide encryption is also used to protect information from being accessed by unauthorized persons or systems when data is at rest. With respect to event management, only authorized (restricted by system role) account holders – event managers, may access attendee lists. For technical support, only trained and certified technical and helpdesk personnel have access to PII for the purposes of identifying the system account holder and communicating the technical assistance requested by the account holder. System modernization and maintenance activities are conducted on test environments which do not contain PII.

Records retention and disposition pending (until the National Archives and Records Administration approves retention and disposal schedule, records will be treated as permanent).

11. Sensitive Questions

Sensitive information, such as religious beliefs, race and/or ethnicity, are NOT collected.

In one specific case – Yellow Ribbon Reintegration Program (YRRP) activities – Service member's families may be asked for gender, DOB and SSN. An explanation of the necessity of collecting this data is not provided on the survey itself, however explanations are provided by staff whenever possible as to why the information in the survey is collected. The information in the surveys is collected to validate the program's service quality and delivery, including helping to plan future events that are equally mindful and attentive of the needs of all sexes. .

In another specific case (implementation planned in the future) – Employer Support Program activities – Service members will be asked for DOB and the SSN in order to allow the Service member to update Civilian Employer Information (CEI).

12. Respondent Burden, and its Labor Costs

   a. Estimation of Respondent Burden

Estimated Annual Respondents: 12,000

   a) Number of responses per respondent: 1

   b) Total Annual Responses: 12,000

   c) Time per response: 10 minutes (or 0.166666667 hours)

   d) Total Annual Hours for all Expected Respondents: 2,000 hours

   b. Labor Cost of Respondent Burden

10 mins (or 0.166666667 hours) x $19.75 (hourly rate*) = $3.29 (per respondent)

Total Labor Cost for 12,000 responses = $3.29 x 12,000 = $39,480

Source: Bureau of Labor Statistics, Weekly and hourly earnings data from the Current Population Survey (LEU0252881500), Q3 2014

13. Respondent Costs Other Than Burden Hour Costs

No additional cost to respondents.

14. Cost to the Federal Government

O&M Costs:

The annual cost to establish and maintain the system for this collection (ONLY) is approximately $550,000 annually. This includes core maintenance, change management, training, outreach/awareness, regulatory compliance, helpdesk, and project/program management.

Labor Costs:

$3.29 (annual labor burden per respondent) x 2000 (expected respondents) = $6,583.33 annually.

Total Costs (approximate):

$550,000 + $6,583.33 = $556,583.33 annually

15. Reasons for Change in Burden

This is a new collection in existence without OMB approval with a new proposed burden.

16. Publication of Results

Results of this collection will not be published.

17. Non-Display of OMB Expiration Date

There is no request to omit the expiration date from the collection instrument.

18. Exceptions to "Certification for Paperwork Reduction Submissions"

No exceptions to the Certifications.