

SUPPORTING STATEMENT

National Language Service Corps

A. JUSTIFICATION

1. Need for Information Collection

This statement is submitted to update and renew the National Language Service Corps' (NLSC) need for information collection and to remove the word "Pilot" from all documentation pertaining to the NLSC henceforth, in support of Section 1913 of Title 50 of the United States Code (U.S.C.) (Document is submitted as part of the OMB submission as Attachment 1) and the proposed rule (Attachment 2).

The overall success of the NLSC Pilot program was articulated in detail in the National Security Education Program 2013 Annual Report (<http://www.nsep.gov/docs/2013-NSEP-Annual-Report.pdf>). Results of the pilot program confirmed the NLSC concept as one that will meet not only the needs of Department of Defense (DoD) but the broader needs of the U.S. Government (USG). Section 1913 of Title 50 U.S.C., authorizes the Secretary of Defense to establish NLSC as a permanent program within the DoD.

The NLSC currently operates under federal guidelines with the processes and procedures validated during its first five years as a pilot program, and recruits from the general public and enroll individuals who would like to volunteer their language skills. The NLSC identifies U.S. citizens who can provide high levels of proficiency in foreign languages and cultural expertise critical to national security for short-term temporary assignments when other resources are not available. The NLSC will fill gaps between requirements of DoD or other departments or agencies of the United States and available language skills where government employees are required or desired. It is critical for the NLSC to continue to utilize members to fill these emergent needs. The NLSC will maintain a system whereby a pool of members with specific language skills can be readily referenced: DoD Directive 5124.2, Under Secretary of Defense for Personnel and Readiness (Attachment 3); 50 U.S.C. 1913, National Language Service Corps.

2. Use of Information

The NLSC is a cost-effective solution to the tactical and strategic management of foreign language support needs within the USG military and civilian enterprise for operations, plans and workforce requirements. Information provided by our nation's population of skilled citizens who speak hundreds of languages enables the NLSC to provide the surge capability critical to our nation's needs. In recent years, the NLSC has supported 78 operations and exercises (23 were conducted outside the continental US) supporting federal agencies inside and outside the DoD requiring language expertise. NLSC members have provided 3,403 man-days of foreign language services and current client interest indicates many more to come.

The NLSC will reach out to U. S. citizens (age 18 or over) who can read, listen, speak, and write in English and read, listen, write and speak at least one other specified language, generally at or above skill level 3 as described by the proficiency guidelines of the Federal Interagency Language Roundtable (ILR). The DoD and the Intelligence Community agencies use these guidelines as the basis for language skill requirements identification, position

descriptions, readiness indices and language bonus pay systems. Therefore, the ILR proficiency guidelines represent a common metric used by USG agencies as a basis for policy, planning and human capital decisions in operational, mission critical areas where language is required.

A proficiency level is generally assigned to a person through an authorized language examination whereby examiners assign a level on a variety of performance criteria exemplified in the descriptive statements. For example, an individual is assigned level 3 if he or she is able to speak the language with sufficient structural accuracy and vocabulary to participate effectively in most formal and informal conversations in practical, social and professional topics. The NLSC confirmed the validity of a self-assessment process for identifying acceptable candidates as a low-cost tool for enrolling the large number of members expected to join. NLSC will identify Members with requisite language skills who can be mobilized as a short term, temporary federal employee to be able to provide a surge capability, and who are otherwise not available to the government.

The qualifications for NLSC membership are 1) U.S. citizenship; 2) at least 18 years of age; 3) fulfillment of selective service requirements; and 4) proficient in English and another language. The NLSC application ascertains answers to items 1-3 and collects information to allow NLSC staff to assess the potential for applicants to meet item 4. The NLSC expects to enroll 1,000 individuals annually who would like to volunteer their language expertise to satisfy their own desire to use their language skills and meet the NLSC objective to effectively bring these multilingual members to the DoD and federal agencies. As of April 30, 2014, the NLSC had 4,925 members. An average growth rate of 1,000 members per year is expected over the next three years. By December 2015, the NLSC expects to have nearly 6,000 members at this rate of growth.

Approximately 15% of the membership will be selected for temporary federal appointment by 2015. As of April 30, 2014, the NLSC has 545 federally hired language consultants. The NLSC staff will liaise between the DoD Human Resources Activity (DoDHRA) and the members to be federally hired. For the NLSC, this process begins when a requesting agency articulates a foreign language services requirement. With this information, the NLSC can prepare ahead of the request by selecting the best qualified member(s) and federally hire them for an anticipated assignment or mission request. The NLSC goal is to prepare for a request for language services by having a ready pool of federally hired members. A capable ready pool can rapidly respond to critical national needs, as well as planned events or exercises. Members will be required to follow DoD hiring policies and practices and will be appointed as language consultants when participating on an assignment. The NLSC will formally certify as many of the federally hired members as possible in their language using established government-approved tests.

Recruiting: It is critical for the NLSC to actively recruit and utilize members in order to support federal language requirements. Interested individuals are directed to the NLSC website for review and an online application. Although online applications are encouraged, all documents can be manually processed. Those unable to view the NLSC website can call, mail, fax, or e-mail inquiries and request an application.

The DD Form 2932, *National Language Service Corps Application* (Attachment 4), is the initial document used to collect information from individuals in the general public who are interested in becoming members of NLSC. The form has been recently revised.

The NLSC Application contains a brief set of screening questions. Individuals are asked to provide basic information (age, citizenship, foreign language(s)), and if they meet eligibility criteria. The Application also requests Selective Service System registration as this is a requirement for federal employment. This information is required since NLSC members who volunteer to perform on assignments will become temporary federal employees. The form also asks for the source of language skills and whether the applicant has used the language professionally. It also asks for educational information to indicate where and how long the applicant spent learning their languages so as to assess the applicant's potential to meet NLSC language proficiency requirements.

Upon receipt by NLSC staff recruiters, the Application is checked for completeness. If the individual meets the minimum requirements, they will receive an invitation to complete the two remaining language-related supplemental documents. The remaining forms are used to specifically address language proficiency.

Additional forms are used to determine eligibility for membership in the National Language Service Corps and collect information for each foreign language where proficiency is identified. The DD Form 2933, *National Language Service Corps Detailed Skills Self-Assessment* (Attachment 5), is a detailed description of the applicant's skills with respect to specific foreign language tasks. The DD Form 2934, *National Language Service Corps Global Language Self-Assessment* (Attachment 6), provides an overall assessment of the applicant's foreign language ability. These forms have recently been revised. Based on responses on these two forms, a phone call will be conducted with the applicant to review the information provided. The NLSC estimates one 10-minute phone call during enrollment. Information verification may be necessary at any time during the enrollment process to certify language skills for entry into the NLSC and perform quality assurance of the certification.

The NLSC will evaluate the language qualifications (English and foreign language) of applicants through a two-stage process. The first stage consists of the self-assessment instruments on DD Forms 2933 and 2934. The self-assessment approach has been scientifically validated as a screening procedure by the Center for Advanced Study of Language (CASL), and has been and will continue to be used to initially screen NLSC applicants for desired language skills. The NLSC concluded in its first five years that the DD Forms 2933 and 2934 are valid instruments for the measurement of language skills and should remain as part of the NLSC screening process.

Additionally, other research data indicates that the self-assessments correlate with formal proficiency testing scores at 70% or better. The NLSC believes that this is sufficient to justify the use of the self-assessment instruments as an initial screening tool for NLSC membership. The final stage of language skill certification is formal proficiency testing. All members selected for federal hiring and deployment will be formally tested prior to deploying in support of any federal agency language requirement.

The information collected in the application and additional forms are used solely by the NLSC. Individuals enrolling in the NLSC volunteer their services freely and can disenroll at any time. There is no binding document committing them to the NLSC; however, the NLSC recruiting staff will send a Commitment Letter (Attachment 7) to the new Member as the final act in this stage to instill a sense of commitment in the newly-enrolled member. When all documentation is completed satisfactorily, and the member meets membership criteria and

returns the Commitment Letter, the applicant is sent a Membership Certificate acknowledging enrollment as a member of the NLSC.

Interactions and Engagements: There will be periodic needs to interact with members once they have completed the application process and have been enrolled. Aside from the NLSC application, there is no more collection of personal information required for membership unless an individual claims to have a security clearance that needs verification for a potential assignment. The NLSC goal is to engage each individual to maintain a sense of community and belonging.

The NLSC staff will engage its members on a regular basis via email, phone, and mailings. The first correspondence after completing the application process is a Welcome Aboard email (Attachment 8). Approximately 1,000 Welcome Aboard emails will be sent annually with the intent of informing new members about the organization. The NLSC staff will minimize the use of phone calls and will make a call only when necessary for information validation, to respond to a question, or when phone screening a member for an assignment. Given the number of members, mass communication is preferable to individual communication. No personal information is gathered on these phone calls.

The only scheduled mailing is to send a Membership Certificate signed by the Director, NLSC, to officially recognize the newly-enrolled member. No personal information is collected during any of these interactions.

NLSC engagements also incorporate online social networks. Through online media, such as Facebook, LinkedIn, and Twitter, the NLSC regularly provides members with information specific to current and past events, possible future assignments, and the NLSC status. Some voluntary feedback is requested; however, this does not include any personal information. The NLSC recognizes the importance of personal contact to minimize attrition. Therefore, the NLSC staff will endeavor to contact each member to ensure that a personal connection is made. The NLSC expects to engage each member quarterly with a newsletter that does not solicit a response; however, the membership is informed of the newsletter themes in advance and asked if they would like to contribute articles.

Renewing NLSC Membership: Current NLSC member records are not permanent. As such, members must renew their membership periodically to maintain their status within the NLSC. The disposition of records has been approved by NARA (Attachment 9). To date, an average of 1,000 members enroll in the NLSC annually. It is anticipated that approximately 1,000 will also need to renew their membership every four years. The NLSC expects 90% of the membership will review and verify their data online. Actual renewal will be completed with an updated e-signature confirming the entered data is either still valid or newly updated. Aside from the signature, no new personal information is collected.

3. Improved Information Technology

The NLSC website www.nlscorps.org, was selected to stay consistent with the branding of the organization. Full implementation of electronic authentication (eAuthentication) is in-place for the online application. All online applicants are required to e-sign the NLSC Application. Members hired as temporary federal employees will follow approved e-signature practices as required by the Defense Human Resources Activity (DoDHRA) or other federal hiring authority.

When a valid application is received, a control number and auto-generated password will be assigned to each individual applying. The applicants will use the assigned numbers and passwords to complete and validate their documents online. The NLSC staff will use the control numbers as individual identifier for applicants. Upon initial login, applicants are prompted to personalize their password, including parameters. The NLSC servers have been granted authority to operate by the DoDHRA Chief Information Officer (CIO) and the DoD CIO. Data entry and collection, maintenance, and access will primarily be accomplished online.

The online forms will be as follows:

- a. NLSC online application (Attachment 10)
- b. NLSC online self-assessments (Attachments 11)

The NLSC estimates 90% of all applicants will initially complete the entire application via an online tool. Thereafter, the forms can be reviewed by the NLSC staff with appropriate access.

4. Efforts to Identify Duplication

The NLSC is a DoD program and no other government agency is responsible for collecting this information. The NLSC is unique in its charter to provide surge capacity for a wide range of languages to support federal, state and local governments in need of temporary short-term foreign language services where government employees are required or desired.

5. Methods Used to Minimize Burden on Small Entities

The NLSC collects information from individuals only and does not place burden on Small Entities.

6. Consequences of Not Collecting the Information

The DoD cannot administer the NLSC without the ability to recruit and access members. If collection of this information was stopped, the NLSC's ability to maintain records and support current users and partners would be severely affected. The list of agencies that NLSC has already supported and have expressed increasing interest, or have active requests with the NLSC includes but is not limited to:

- Centers for Disease Control and Prevention
- Central Intelligence Agency
- Consumer Financial Protection Bureau
- Department of Defense
 - Defense Language Institute Foreign Language Center
 - Defense Threat Reduction Agency
 - Defense Intelligence Agency
 - National Media Exploitation Center
 - Office of the Undersecretary of Defense for Personnel and Readiness
 - Director, Training Readiness and Strategy
- U.S. Africa Command
 - U.S. Naval Forces Africa
 - U.S. Marine Forces Africa

- U.S. Army Africa
- U.S. Army
 - 162nd Infantry Brigade
 - Cadet Corps
 - Legal Services Agency
 - Machine Foreign Language Translation System
 - Office of the Army Judge Advocate General
- U.S. Central Command
 - Army Central Command
 - Special Operations Command Central
- U.S. Coast Guard
- U.S. European Command
 - U.S. Naval Forces Europe
 - U.S. Army Europe
- U.S. Marine Corps
 - Center for Advanced Operational Culture Learning
- U.S. Navy
 - Naval Post Graduate School, Joint Foreign Area Officer Program
- U.S. Northern Command
- U.S. Pacific Command
 - Special Operations Command Pacific
 - U.S. Army Pacific
 - U.S. Pacific Air Forces
- U.S. Southern Command
- U.S. Special Operations Command
 - Joint Special Operations University
- U.S. Transportation Command
- Joint POW/MIA Accounting Command
- National Guard
 - Guam National Guard
 - North Carolina National Guard
 - Utah National Guard
 - Washington National Guard
- Peace Corps
- Department of Homeland Security
 - Center for Immigration Studies
 - Civil Rights and Civil Liberties
 - Federal Emergency Management Agency
 - Immigration and Customs Enforcement
- Department of Justice
 - Civil Rights Division
 - Drug Enforcement Administration
 - Federal Bureau of Investigation
 - INTERPOL Washington
- Department of Labor
- Department of State
 - Office of the Coordinator for Reconstruction and Stabilization
- Internal Revenue Service
- National Security Agency
- Office of the Director National Intelligence

7. Special Circumstances

There are no 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 information collected is for verification. The mission of the NLSC is to provide U.S. citizens with foreign language skills and regional expertise to support DoD and other U.S. departments and agencies in need of temporary, short-term foreign language services. Public comments for this critical information collection requirement is requested as part of the proposed rule. The 30 Day Notice for this collection published on November 11, 2015, 80 FR 69649.

No other federal agency addresses the capabilities for quickly meeting short-, mid-, and long-term requirements through the identification and warehousing of expertise and skills in current and potential critical languages.

9. Payments to Respondents

There are no payments to respondents.

10. Assurance of Confidentiality

This information collection does not ask the respondent to submit proprietary, trade secret, or confidential information to the NLSC.

11. Personally Identifiable Information (PII), Social Security Number (SSN), System of Records Notice (SORN).

PII: Respondents are advised that their data is For Official Use Only and will be maintained and used in strictest confidence in accordance with federal law and regulations. 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.

SSN: The SSN is not required for enrollment into the NLSC.

Sensitive Questions: N/A

PIA: The PIA, National Language Service Corps (NLSC) Records, is included as part of this OMB submission as Attachment 13.

SORN: The draft update to DHRA 07 is included with this submission (Attachment 14).

With regards to disclosures generally permitted under 5 U.S.C. 552a (b) of the Privacy Act, personal records or information may specifically be disclosed outside the DoD as a routine use pursuant to 5 U.S.C. 552a (b) (3). Access to personal information is restricted to NLSC personnel who require the records in the performance of their official duties. Access to personal

information is further restricted by the use of passwords that are changed periodically. Physical entry is restricted by the use of locks, guards, and administrative procedures.

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

Recruiting Application: The response burden is estimated with the assumption that 1,500 individuals will annually apply for Membership using the DD Form 2932 online. Of those initial applicants, the NLSC estimates 1,000 will satisfy basic requirements and be invited to complete and submit the remaining NLSC documents (DD Forms 2933 and 2934) and be contacted by phone to verify information. Selected applicants will be sent a Commitment Letter asking the individual to sign a non-binding voluntary commitment to the NLSC. Of the 1,000 new annual members, approximately 200 are anticipated to be hired as temporary federal employees who meet requirements articulated by agencies to perform foreign language services.

a. Response Burden

The response burden is calculated for DD Form 2932, 2933 and 2934 and a telephone interview.

(1) DD Form 2932

Total annual respondents:	1,500
Frequency of response:	1
Total annual responses:	1,500
Burden per response	18 minutes
Total burden hours:	27,000 mins/60 = 450 hours

(2) DD Form 2933

Total annual respondents:	1,000
Frequency of response:	1
Total annual responses:	1,000
Burden per response	18 minutes
Total burden hours:	18,000 mins/60 = 300 hours

(3) DD Form 2934

Total annual respondents:	1,000
Frequency of response:	1
Total annual responses:	1,000
Burden per response	18 minutes
Total burden hours:	18,000 mins/60 = 300 hours

(4) Phone Call

Total annual respondents:	1,000
Frequency of response:	1
Total annual responses:	1,000
Burden per response	10 mins
Total burden hours:	10,000 mins/60 = 167 hours

- a. The estimate for the burden per response was determined by averaging the time it took six people to complete DD Forms.
- b. Labor Cost to the Respondents

Federal scale GS-5 wage is \$13.28 per hour and the federal minimum wage is \$7.25 per hour. For estimation purposes, 50% of the applicants are assumed to have earnings equivalent to Federal employees in the GS-5 range and the other 50% are assumed to have earnings equivalent to the federal minimum wage.

(1) DD Form 2932

$\$13.28/60 \text{ mins} = \$.22 \text{ per min} \times 18 \text{ mins} \times 750 = \$2,970.00$
 $\$7.25/60 \text{ mins} = \$.12 \text{ per min} \times 18 \text{ mins} \times 750 = \$1,620.00$
 Total Labor Cost: \$4,590.00

(2) DD Form 2933

$\$13.28/60 \text{ mins} = \$.22 \text{ per min} \times 18 \text{ mins} \times 500 = \$1,980.00$
 $\$7.25/60 \text{ mins} = \$.12 \text{ per min} \times 18 \text{ mins} \times 500 = \$1,080.00$
 Total Labor Cost: \$3,060.00

(3) DD Form 2934

$\$13.28/60 \text{ mins} = \$.22 \text{ per min} \times 18 \text{ mins} \times 500 = \$1,980.00$
 $\$7.25/60 \text{ mins} = \$.12 \text{ per min} \times 18 \text{ mins} \times 500 = \$1,080.00$
 Total Labor Cost: \$3,060.00

(4) Phone Call

$\$13.28/60 \text{ mins} = \$.22 \text{ per min} \times 10 \text{ mins} \times 500 = \$1,100.00$
 $\$7.25/60 \text{ mins} = \$.12 \text{ per min} \times 10 \text{ mins} \times 500 = \600.00
 Total Labor Cost: \$1,700.00

Labor Response Burden

- (1) Total Average Response Burden:
 - Total annual respondents: 1,500
 - Frequency of response: 1.55/respondent
 - Total annual responses: 1,500
 - Total burden per response: 64 minutes
 - Total burden hours: 1,217 hours

Labor Cost to the Respondents

Federal scale GS-5 wage is \$13.28 per hour and the federal minimum wage is \$7.25 per hour. For estimation purposes, 50% of the applicants are assumed to have earnings equivalent to Federal employees in the GS-5 range and the other 50% are assumed to have earnings equivalent to the federal minimum wage.

Total Labor Cost: $4,590 + 3,060 + 3,060 + 1,700 = \$12,410$

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 start-up cost to the respondent.
 - b. Operational and Maintenance Cost. There is no operational and maintenance cost to the respondent. A Bulk Mailing Permit will be used for materials that are sent to the respondent and material that will be returned by the respondent.

14. Estimates of Cost to the Federal Government:

Similar to section 12, the NLSC will estimate the cost to the government based on the Recruiting/Application.

Recruiting/Application Forms Processing

Federal scale GS-5 minimum wage is \$13.28 per hour.

- (1) DD Form 2932 (The NLSC estimates 1,500 annually will apply and 90% are expected to be completed online)

Manual processing:

$\$13.28/60 \text{ mins} = \$.22 \text{ per min} \times 10 \text{ mins} \times 150 = \330.00

Online process of forms:

$\$13.28/60 \text{ mins} = \$.22 \text{ per min} \times 3 \text{ mins} \times 1,350 = \891.00

Total Cost: \$1,221.00

- (2) DD Forms 2933 and 2934 (These forms are processed together; NLSC estimates 1,000 annually with 90% are expected to be completed online)

Manual processing:

$\$13.28/60 \text{ mins} = \$.22 \text{ per min} \times 10 \text{ mins} \times 150 = \330.00

Online process of forms:

$\$13.28/60 \text{ mins} = \$.22 \text{ per min} \times 3 \text{ mins} \times 1,350 = \891.00

Total Cost: \$1,221.00

- (3) Phone Call: Information validation (1,000 annually)

$$\$13.28/60 \text{ mins} = \$0.22 \text{ per min} \times 10 \text{ mins} \times 1000 = \$2,200.00$$

(4) Commitment Letter processing (1,000 annually)

$$\$13.28/60 \text{ mins} = \$0.22 \text{ a min} \times 5 \text{ mins} \times 1000 = \$1,100.00$$

Total Recruiting/Application costs: $1,221 + 1,221 + 2,200 + 1,100 = \$5,742$

Annualized Contractual, Equipment, and Printing Costs:

Historical estimates for the Recruiting/Application are based on 1,500 total annual respondents, where all 1,500 will initially complete the DD Form 2932. It is assumed the 90% of all applications will be completed online, so Mailing 1 represents 10% of the total estimated, or 150. After the initial application screening, an estimated 1,000 will receive an invite to complete the supplementary documents online (DD forms 2933 and 2934). Ninety percent will be completed online but Mailing 2 will go to 10% or approximately 100. Once screened, accepted applicants will be sent the commitment letter by email asking for a voluntary commitment to the NLSC. Given the initial 150 mailings and 100 to follow-up, the NLSC expects a total of 250 mailings annually for Recruiting/Application. Each mailing will have a postage-paid and self-addressed envelope; therefore, the NLSC estimates there will be a total of 500 postage-paid envelopes.

Mailing 1: Cover Letter, DD Form 2932 (150)

Mailing 2: Cover Letter, DD Forms 2933 and 2934 (100)

$$150 + 100 = 250$$

Post Office Mailbox Contract: \$180.00

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Mailing 1: $\$1.25 \times 300$ (150 Responses plus 150 return envelopes) = \$375

Mailing 2: $\$1.25 \times 200$ (100 Responses plus 100 return envelopes) = \$250

Total Annualized Contractual, Equipment, and Printing costs: $\$180 + \$375 + \$250 = \805

Total Annualized Cost to the Government:

(1) Recruiting/Application Forms Processing: \$5,742

(2) Contractual, Equipment, and Printing: \$805

(3) Total Annualized Costs: $5,742 + 805 = \$6,547$

15. Changes in Burden.

Changes result in reduced burden due to the implementation of an online application system and streamlined processes, as well as an estimated fewer number of of applicants annually.

16. Publication Plans/Time Schedule.

The publication plans/time schedule do not apply. The information collection will not be published for statistical use.

17. Approval Not to Display Expiration Date.

The approval not to display expiration date does not apply.

18. Exceptions to the Certification Statement.

Exception to the Certification Statement does not apply.