

Supporting Statement Part A
Department of Defense
Office of the Under Secretary of Defense for Personnel and Readiness
Request for Processing and Approval
Voluntary Military Education Programs Advertising and Marketing

A. JUSTIFICATION

1. Need for the Information Collection

The Department of Defense (DoD) Instruction 1322.25 and Voluntary Education Partnership Memorandum of Understanding (MOU) effective July 7, 2014, requires institutions to adopt policies outlined in section 3.j. of the MOU as "part of efforts to eliminate unfair, deceptive, and abusive marketing aimed at Service members." The Secretary of Defense is directed to submit a report documenting its oversight, evaluation and enforcement of this provision, along with institutional data on advertising and marketing budgets. The report shall include the institution's total marketing, advertising and recruitment budget, and the percentage of that budget targeting Service members.

2. Use of the Information

The report on Voluntary Military Education Programs - Advertising and Marketing was requested in the FY14 Consolidated Appropriations Joint Explanatory Statement for the FY14 National Defense Authorization Act, page 31, with a reporting date on or before June 1, 2014. In early 2014, it became evident that the data collection and storage requirements were more complex than originally anticipated and would require additional time to complete. The Department initiated a one-year extension (June 1, 2015), request for submitting this report as such data collections are unprecedented in the domain of Voluntary Education. Specifically, the Report requested an assessment of the Department's oversight, evaluation, and enforcement of the DoD MOU reference the provisions enacted to eliminate aggressive marketing targeting of Service members and their spouses to include a voluntary reporting of institutional data on advertising and marketing budgets. The data collected will be used to respond to the Congressional request.

Due to administrative obstacles, the final report was not submitted to Congress by the June 1, 2015 deadline. Our office initiated an additional extension to provide sufficient time to allow for the approval of the Paper Reduction Act submission, as well as required data collection, analysis and report development. This emergency submission is necessary. The aggressive advertising and marketing report is now due to Congress on March 30, 2016 and the anticipated data collection will be 30 days.

3. Use of Information Technology

The request for information does not involve the use of technological collection techniques. Due to the small volume of information, the requested data will be submitted in a standardized Excel Worksheet via email correspondence.

4. Non-duplication

Currently, there is no system in place to collect the required advertising and marketing budget data from educational institutions. The data will require voluntary reporting by educational institutions.

5. Burden on Small Business

The data collection is not anticipated to burden small entities. The request for information does not require information collection from small businesses or other small entities.

6. Less Frequent Collection

The data request is a one-time collection and targets only ten educational institutions.

7. Paperwork Reduction Act Guidelines

There are no special circumstances. The information collection will be collected in a manner consistent with the guidelines delineated in 5 CFR 1320.5(d)(2).

8. Consultation and Public Comments

a. The collection is being submitted to OMB with a request for emergency processing and therefore a 60-day FRN is not being published. A 30-day FRN has been published on 12/24/2015 in Vol. 80 of the Federal Register, page 80330.

9. Gifts or Payment

This information collection does not provide any payment of gift to respondents.

10. Confidentiality

All information collection activities will be conducted in full compliance with the requirements of the Privacy Act, § 552 of Title 5, United States Code, and Treasury regulations. The DoD letter of instructions to the educational institutions will explain that personally identifiable information (PII) data is not required for this collection. DoD will implement the

appropriate security measures to ensure data is safeguarded including the use of locked file storage, confidentiality stamping, and disposal by crosscut shredding. The data collection does not require submission of PII information. A System of Records Notice (SORN) ID number is not required.

11. Sensitive Questions

The Voluntary Military Education Programs Advertising and Marketing request for information does not include questions pertaining to sexual behavior or attitude, religious beliefs, race and/or ethnicity, age group, sexual gender, or the collection of SSN. The questions contained in this report do not violate the Privacy Act, as implemented by DoD 5400.11-R. The report will include questions directed to the educational institutions' budget for Advertising and Marketing and the percentage of the budget that directly targets Service members.

12. Respondent Burden, and its Labor Costs

a. Estimation of Respondent Burden

Type of Intake	Estimated Number of Respondents (one time collection)	Estimated Number of Intakes per Respondent	Average Burden Hours per intake	Estimated Total Annual Burden Hours Requested
Electronically (email)	10	1	24	240

The estimated number of respondents comes from the 10 educational institutions selected to participate in the data collection. The annual burden hours are based upon the number of responses received per educational institution. We expect the submission of one response per respondent and the intake process to take approximately 24 hours to complete. Therefore, the estimated total annual burden hours requested would total 240 hours.

b. Labor Cost of Respondent Burden

There will be no annualized capital or start-up costs for the respondents to collect and submit this information. However, the respondent's time to complete the collection of data is calculated as follows (using data from the US Bureau of Labor Statistics for 2013 and the number of work hours =1080). Average Financial Specialist Salary per hour: \$31.20 x 24 hours = \$748.80 x 10 Responses = \$7,480.

Average Burden Hours per data collection	Average cost per hour for Financial Specialist	Estimated Number of Respondents	Estimated Total Annual Cost Burden to Respondents
24	\$31.20	10	\$7,480

13. Respondent Costs Other Than Burden Hour Costs

The collection of Advertising and Marketing data from the 10 educational institutions is a one-time submission and does not incur an annualized cost. There are no capital, start-up costs or operational and maintenance costs associated with this data collection.

14. Cost to the Federal Government

The federal government will not incur an annual sustainment operations cost for the collection of this information, this is a one-time report. Estimated costs (\$4,320) relating to the processing of collected information by a government worker is calculated as follows: Total Hours (240) x Average cost of GS worker (\$18) (average salary/number of hours worked) = \$4,320 government cost.

15. Reasons for Change in Burden

The information collection is related to a new program mandated by the Presidential Executive Order 13607 and the DoDI 1322.25 and DoD MOU.

16. Publication of Results

Data collected will be analyzed and aggregate results may be provided in reports to be issued by DoD. The results of analyses will be presented at the aggregate level in summaries, reports, and briefings. Based on the limitations of the data, any analysis will be limited to descriptive results. The responses of individual educational institution will be identifiable.

17. Non-Display of OMB Expiration Date

The expiration date for OMB approval will be displayed in the request for information email/letter to the participating educational institutions.

18. Exceptions to "Certification for Paperwork Reduction Submissions"

DoD is not requesting any exceptions to the certification statement identified in Item 19 "Certification for Paperwork Reduction Act Submissions."