

USMA PRE-CANDIDATE PROCEDURES (0702-0060)

SUPPORTING STATEMENT – PART A

A. JUSTIFICATION

1. Need for the Information Collection

The United States Military Academy (USMA) is under the immediate supervision and control of the Department of the Army (Section 4334(a), Title 10, United States Code (10 USC 4334(a)). It operates under the jurisdiction of the Chief of Staff, United States Army (Department of the Army General Order No. 3, 10 February 1977). It is funded as a separate operating agency (DFAS-IN Manual 37-100). The mission of USMA is to educate, train, and inspire the Corps of Cadets so that each graduate is a commissioned leader of character committed the values of duty, honor, country; professional growth throughout a career as an officer in the United States Army; and a lifetime of selfless service to the nation.

This information collection is required to guide qualified candidates through the successful completion of the USMA Admissions Process. The data assists the USMA Department of Admissions, the Admissions Committee, and the Academic Board in determining the candidates who will annually fill the incoming USMA class.

This collection is authorized by Title 10, United States Code, Section 4346 which outlines the requirements for admission to the United States Military Academy, and Army Regulation 210-26, "United States Military Academy". Finally, the collection of this data complies with 5 CFR 1320.9.

2. Use of the Information

Student information is obtained through on-line responses to advertising campaigns and inquiries via the Department of Admissions website, which permit potential candidates to request information on the US Military Academy. This initial student information is received via the Electronic Request for Information (ERI). Once the ERI is processed, the individual's name and email address are forwarded to the local USMA Admissions representative so that he or she can answer questions, and also give the candidate a local USMA point of contact. All other information is retained in a database until the potential candidate completes a Candidate Questionnaire (CQ). The purpose of the ERI is to build and maintain contact with a group of individuals who may eventually be evaluated for admission to West Point. This information is maintained in a database managed by USMA's Systems Engineering Branch. The database and database interfaces are managed under the Academy Management System (AMS).

When an individual decides to apply for admission to West Point, he or she is required to complete a CQ. The CQ is an on-line (electronic) tool that allows a potential candidate to provide relevant information to determine if they meet the minimum qualifications for admission to West Point and if they are competitive for admission. Prior to completing

individuals are considered “pre-candidates” until they have completed the Candidate Questionnaire and are determined to be competitive for admission to West Point. Interested applicants will navigate to the Department of Admissions website: www.usma.edu/admissions, to begin the process. Once on the website, interested applicants will click on the apply link which reflects the dates the application window will be open, as well as the basic requirements for starting an application. Once the applicant determines that he or she meets the basic requirements, he or she will then click on the start application radio button, which takes them to the CQ. The on-line CQ is currently being revised by our IT Directorate to include the Agency Disclosure Notice (ADN), Privacy Act Statement (PAS) and instructions as displayed on the provided draft. The expected completion date is 30 September 2016.

The CQ replaced the following forms USMA-375, USMA 21-12, USMA 21-27, and USMA-381. Forms USMA-450 and USMA-723 previously mentioned in our public comment are no longer being utilized or applicable.

The CQ collects the following data for application of admission to USMA: applicant’s name, SSN, gender, contact information, race, ethnicity, citizenship, Congressional District, high school, class rank, standardized test scores, sport and other extracurricular participation, Military service, release of information authorization, remarks, and interest in attended other institutions, and competing for a Reserve Officer Training Corps (ROTC) scholarship.

The Directorate of Admissions at USMA utilizes the data collected from the CQ to evaluate the admissibility of potential candidates for USMA. Once an applicant completes the CQ, he or she will receive an email thanking them for their interest in the U.S. Military Academy along with an attachment of the information submitted to the Admission Office (a copy of the email and attachment is provided with this PRA package for OMB review). Additionally, applicants receive their unique West Point ID and password which will allow them to access their information and continue the admissions process via their candidate portal.

3. Use of Information Technology

Over the past four years, USMA has migrated to an electronic admissions application process. 100 percent of all requests for information about the admissions process are collected electronically through on-line response submissions or e-mail.

4. Non-duplication

There is minimal duplication from student respondents. The only duplication of information collection is when a candidate begins the CQ. Some basic personal information (name, age, date of birth, high school graduation year) is required that was already collected when the student requested information about admission to West Point. This duplication is required due to the management of information between two databases – one for pre-candidates and one for candidates. There are no systems readily available that collect, nor can be modified to collect, the information requested from this collection.

5. Burden on Small Business

This collection does not involve small businesses or other small entities.

6. Less Frequent Collection

Failure to conduct the collection of this data would negatively impact the US Military Academy's means of establishing a candidate base for admitting qualified candidates. West Point receives 75,000 inquiries each year from students in elementary to high school grades. Limiting the use of this data gathering program would hinder the Academy's ability to select the best and brightest students for admission.

7. Paperwork Reduction Act Guidelines

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

8. Consultation and Public Comments

a. A 60-Day Notice of the proposed collection was published in the Federal Register on September 29, 2015, 80 FRN 58469. No comments were received. A 30-Day Notice of the collection's submission to OMB was published in the Federal Register on September 30, 2016, 81 FRN 67332.

b. Significant input and information was received from Admissions Officers, members of Admissions Committee, and candidates in relation to the continued use and burden relative to collection of information for this system of records. It is determined that the information is only maintained in one database and used accordingly as outlined in section 2 of this Supporting Statement.

9. Gifts or Payment

There is no payment or gift provided to respondents.

10. Confidentiality

Personal data information is securely collected, stored and managed in accordance with the final draft copy of the U.S. Military Academy Management System (AMS), Systems of Records Notice (SORN) A0351-17b USMA.

Information collected is protected under the Privacy Act of 1974 as amended. Respondents are assured confidentiality through the Privacy Act Statements on the applicable collection documents. The AMS system abides by the Department of Defense cyber security policies and requirements. The AMS system is located in secure facilities and is adequately protected on secure servers. Electronically and optically stored records are maintained in fail-

safe system software with protected access. The web pages are protected by Secure Layer (SSL, i.e. HTTPS). Records are accessible only to authorized persons with a need-to-know who are properly screened, cleared and trained to perform official duties. Access is controlled role based controls leveraging active directory authentication. Buildings employ alarms or rooms that are security-controlled areas accessible only to authorized personnel. The information is protected by unique login and passwords which prevents access, browsing and misuse of personal data by unauthorized users.

The PIA is not currently published as it's gone through the review process with our Program Manager and leadership and is currently pending review by the Army, Chief Information Officer/G-6 for approval. In absence of an approved PIA, a final draft copy of the PIA (Academy Management System (AMS) DA 03899 Sections 1 and 2 have been provided with this package for OMB review.

The records retention of cadets who are commissioned become part of his/her Official Military Personnel File. Records on individuals not commissioned are destroyed after 5 years. Microfilmed and records maintained by USMA are permanent, hard copy files are destroyed after being microfilmed.

11. Sensitive Question.

Questions about gender and ethnicity are in the application process. These questions are necessary because West Point strives to maintain a class composition of top scholars, leaders and athletes of all genders and ethnicities. We fully believe that a diverse collegiate environment helps stimulate the educational experience for all cadets within the United States Military Academy. 10 U.S.C. 3013 and 4334 outline the authority to collect this information. All race and gender information is obtained in a manner consistent with the Tabulation Working Group of the Interagency Committee for the Review of Standards Data on Race and Ethnicity's (December 15, 2000) guidance in the Provisional Guidance on the Implementation of the 1997 Standards for Federal Data on Race and Ethnicity. A Social Security Number Justification Memo is provided in this package to grant authority for SSN collection.

12. Respondent Burden, and its Labor Costs

a. Estimation of Respondent Burden

Each year, the United States Military Academy, on average, receives requests for information from approximately 75,000 students. Of these 75,000 requests, approximately 15,000 individuals will officially open an admissions file by completing the CQ.

Estimation of Respondent Burden Hours					
	Number of Respondents	Number of Responses per Respondent	Number of Total Annual Responses	Response Time (Amount of time needed to complete the collection instrument)	Respondent Burden Hours (Total Annual Responses multiplied by Response Time) Please compute these into hours
Electronic Request for Information (unique responders)	60,000	1	60,000	5 Minutes (.0833 Hours)	5,000 Hours
Candidate Questionnaire (unique responders)	15,000	1	15,000	20 Minutes (.33 Hours)	5,000 Hours
TOTAL	75,000	1	75,000	25 Minutes (.4133 Hours)	10,000 Hours

b. Labor Cost of Respondent Burden

Utilizing the United States Department of Labor Wage and Hours Division's Federal Minimum Wage of \$7.25 (July 24th 2009, <https://www.dol.gov/whd/flsa/> it is estimated the annual labor costs to respondents be \$72,501

Labor Costs of Respondent Burden					
	Number of Respondents	Response Time per Response	Respondent Hourly Wage	Labor Burden Per Response	Total Labor Burden
Electronic Request for Information	60,000	5 Minutes	7.25/Hour	\$.6041	\$36,246
Candidate Questionnaire	15,000	20 Minutes	\$7.25/Hour	\$2.417	\$36,255
Total	75,000	25 Minutes	\$7.25/Hour	\$3.021	\$72,501

13. Respondent Costs Other Burden Hour Costs

There are no capital or start-up costs associated with this information collection.

14. Cost to the Federal Government

Total cost to the government is \$182,900 per year (\$176,400 for personnel costs and \$6,500 for overhead costs).

Labor Costs to the Federal Government			
	Electronic Request for Information	Candidate Questionnaire	Total
Number of Responses	60,000	15,000	75,000
Processing Time per Response (in hours)	.0833 Hours (5 Minutes)	.33 Hours (20 Minutes)	.4133 Hours (25 Minutes)
Hourly Wage of Worker(s) Processing Responses*	\$17.72/Hour	\$17.72/Hour	\$17.72/Hour
Costs to Process Each Response (Processing Time per Response multiplied by Hourly Wage of Worker(s) Processing Responses)	\$1.48	\$5.84	\$7.32
Total Cost to Process Responses (Costs to Process Each Response Multiplied by Number of Responses)	\$88,800	\$87,600	\$176,400

* GS Salary Table 2016-NY: https://www.opm.gov/policy-data-oversight/pay-leave/salaries-wages/salary-tables/pdf/2016/NY_h.pdf. Used the salary for a GS-04 Step 5.

Operational and Maintenance Costs						
Equipment	Printing	Postage	Software Purchases	Licensing Costs	Other	Total
\$0	\$0	\$0	\$0	\$4,000	\$2500	\$6500

Total Cost to the Federal Government		
Operational and Maintenance Costs	Labor Cost to the Federal Government	Total Costs (O&M Costs + Labor Costs)
\$6500	\$176,400	\$182,900

15. Reasons for Change in Burden

The change in burden hours is a result of the implementation of new processes to collect this information electronically. The same information is being collected, however, the elimination of paper-based forms has reduced the processing time on the part of Admissions personnel. Additionally, the previous costs associated with producing and mailing out candidate questionnaires and other associated documents have been eliminated.

16. Publication of Results

There are no plans to publish results of this collection.

17. Non-Display of OMB Expiration Date

There is no request for approval to omit the display of the expiration date of the OMB approval on the instrument.

18. Exceptions to "Certification for Paperwork Reduction Submissions"

There are no exceptions.