

## SUPPORTING STATEMENT – PART A

### OMB Control Number 0704-0290, Armed Forces Participation in Public Events

#### A. JUSTIFICATION

##### 1. Need for the Information Collection

Section 113 of title 10, Secretary of Defense, paragraph (c) (1)(A) through (B) notes the Secretary of Defense must submit a report to the President and the Congress on accomplishments of each military department, noting elimination of unnecessary duplication. In order to be good stewards of taxpayers' dollars, DoD units and agencies must collect information from event sponsors who request military support per DoD Instruction 5410.19, paragraph 6.4, "The DoD Components shall use current DoD support request forms, such as DD Form 2535, "Request for Military Aerial Support," and DD Form 2536, "Request for Armed Forces Participation in Public Events (Non-aviation)," in evaluating and processing requests from event sponsors for support by the Military Services in community relations activities. The information entered into those forms by the sponsors of an event must provide sufficient information for evaluating the level of DoD support applicable for the event and overall compliance with the requirements of this Instruction." If forms are not properly completed, Military Services will not be able to ascertain if events are eligible for support or if duplicative support is being requested for a single event. Use of these forms by all Military Departments provides uniformity to ensure appropriate information is collected regarding military support, which helps streamline the process. If the forms are not completed in their entirety, the processing time would be hindered because Military Services would not be able to determine whether desired military support is available or appropriate for the request. Furthermore, proceeding with an incomplete aviation request form could create an unnecessary safety hazard at a public event. In addition, DoDI 5410.19, paragraph 6.5 states, "Requests from local event sponsors for community relations support by the Military Services shall be addressed to the nearest military installation and forwarded, if required, with applicable recommendations, to the applicable approval level through normal chain of command procedures."

##### 2. Use of the Information

Event sponsors who request aviation or non-aviation military support for community events complete DD Forms 2535 or 2536, found on line at <http://www.dtic.mil/whs/directives/forms/eforms/> for Military Department consideration. Some respondents obtain the request forms from Military Department community

relations websites. Once the forms are completed, the respondents have several options noted on the back of the forms for submitting their requests to the closest military installation or appropriate Military Service. With the Internet, most requests are submitted online. Respondents accessing online request forms such as <http://www.outreachrequests.hq.af.mil/PublicSite/index.cfm?fwa=home> must first click through the Department's privacy statement and agency disclosure notices. Respondents are notified on the forms that all data collected will be for official use only. Once information has been submitted, installation and command public affairs officers who receive the data will use the collected information to evaluate public affairs requests. The community relations staff will compare the information against DoD standards to determine if Armed Forces participation is authorized and then determine if assets are available. As part of the information collection process, the DD Form 2535 is submitted to the Federal Aviation Administration for coordination on safety precautions prior to a Military Department receiving the form. The questions asked on the DD Form 2536 are straightforward for non-aviation requests. Respondents may be contacted telephonically and/or in writing depending on whether additional information is required, the notification status, and each Military Department's communication process. There is no standard form letter that is provided to respondents as each request is unique. DD Forms 2535 and 2536 are later destroyed in accordance with each agency's records disposition schedule. The information is not shared with other staffs or agencies except on a need to know basis. Typically, the only data shared is information necessary for the tasked unit to arrive at the proper location at the correct time with the requested support.

### 3. Use of Information Technology

About ninety percent of the data collected is done so electronically. Forms are made available on various DoD and Military Department Internet pages for the respondents' convenience.

### 4. Non-duplication

The Office of the Assistant to the Secretary of Defense for Public Affairs and its counterpart Service staffs are the only organizations having responsibility for public affairs matters. Information required to determine eligibility for community relations support of public events is sufficiently unique to preclude duplication of this collection of information in the Department of Defense.

5. Burden on Small Business

This is no significant impact on small business entities.

6. Less Frequent Collection

DoD will be unable to conduct its community relations program if it cannot collect information necessary to evaluate the propriety of military participation in public events. Collection cannot be conducted less frequently because each request is, in and of itself, unique and must be evaluated on a case-by-case basis.

7. Paperwork Reduction Act Guidelines

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

8. Consultation and Public Comments

PART A: PUBLIC NOTICE

A 60 Day Federal Register Notice was published on July 25, 2016, Vol. 81 FRN 142 48404. No public comments were received.

A 30 Day Federal Register Notice was published on September 29, 2016, Vol. 81 FRN 189 66950. No public comments were received.

PART B: CONSULTATION

Since the last OMB form renewal, DoD has consulted with each of the Military Departments to determine whether information collected was still relevant and vital to determining whether events are eligible for military support and to notifying respondents. Letters are not mailed to respondents; therefore, the previous request for mailing addresses was omitted. Similarly, with the increased use of social media as means for publicizing events, information about social media outreach was added to the form. Military Departments also requested respondents self-identify as being a profit or nonprofit organization, which may be important information when reviewing an event for its ethical appropriateness.

9. Gifts or Payment

No payments or gifts will be made to respondents.

## 10. Confidentiality

Both forms have been reviewed by the Privacy Act Office and no further information was required. Respondents are advised on the front page of the request form that all data provided "will be handled on a 'For Official Use Only' basis." Additionally, the forms were reviewed by the Records Management Office, which noted forms should be retained in accordance with Military Department Record Management instructions. The forms were found to not constitute an internal collection. The collection instruments do not require Privacy Act Statements. A SORN is not required because records are not retrievable by PII. A PIA is not required because PII is not being collected electronically.

## 11. Sensitive Questions

No questions of a sensitive matter are included in the request format.

12. Respondent Burden, and its Labor Costs

a. Estimation of Respondent Burden

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)
DD Form 2536	45,000	1	45,000	0.33 hours	14,850 hours
DD Form 2535	6,000	1	6,000	0.5 hours	3,000 hours
Total Annual Burden					17,850 hours

b. Labor Cost of Respondent Burden

Labor Cost of Respondent Burden					
	Number of Responses	Response Time per Response	Respondent Hourly Wage*	Labor Burden per Response (Response Time multiplied by Respondent Hourly Wage)	Total Labor Burden (Number of Responses multiplied by Response Time multiplied by Respondent Hourly Wage)
DD Form 2536	45,000	.33	\$13.72	(.33*13.72) \$4.53	(45,000*.33*13.72) \$203,742
DD Form 2535	6,000	.5	\$13.72	(.5*13.72) \$6.86	(6,000*.5* 13.72) \$41,160

Total	51,000		\$13.72		\$249,007.50
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\*Although respondents are generally not Federal Government workers, this calculation is based on the assumption that many employees or volunteers who are completing forms for event sponsors are administrative staff. Therefore, the hourly wage rate for respondents is based on the equivalent 2016 General Schedule salary rate for a GS-4/Step 5 employee.

13. Respondent Costs Other Than Burden Hour Costs

Respondents who do not submit their forms electronically online tend to fax or email the forms, negating the need for postage. Therefore, there are no additional costs to respondents. No start-up costs are required.

14. Cost to the Federal Government

Total annual cost to the Federal Government is estimated at \$361,153.50. This includes the manpower costs of processing and responding to the estimated 51,000 annual inquiries (20 minutes per 45,000 inquiries [DD Form 2536] at \$16.77 per hour; and 30 minutes per 6,000 inquiries [DD Form 2535] at \$16.77 per hour). This is an extension of a previously approved collection. The only other O&M funds incurred to review a request are for office equipment used to review the forms online. Printing of forms is not required because they are available through electronic media. The Federal Government currently incurs all of these costs.

Labor Cost to the Federal Government			
	DD Form 2536	DD Form 2535	Total
Number of Responses	45,000	6,000	51,000
Processing Time Per Response (in hours)	.333 hours	.5 hours	.833 hours
Hourly Wage of Worker( s) Processing Responses	(GS-7/1) \$16.77	(GS-7/1) \$16.77	\$16.77/hour
Cost to Process Each Response (Processing Time Per Response multiplied by Hourly Wage of Worker( s) Processing Responses)	(.333*16.77) \$5.58	(.5 * 16.77) \$8.39	Average cost (5.58 + 8.39/2) \$6.98
Total Cost to Process Responses (Cost to Process Each Response multiplied by Number of	(\$5.58*45,000) \$251,100	(\$8.39*6,000) \$50,340	Average cost (251, 100+50,340/2) \$150,720

Responses						
Operational and Maintenance Costs						
Equipment	Printing	Postage	Software Purchases	Licensing Costs	Other	Total
(\$54,285 +5,428.50) \$59,713.50**	0	0		0		\$59,713.50

\*\*This cost allows for a ten percent increase (\$5,428.50) in equipment purchases since the last submission three years ago and assumes the government purchases computers with upgraded software and sufficient site licenses.



Total Cost to the Federal Government		
Operational and Maintenance Costs	Labor Cost to the Federal Government	Total Cost (O&M Costs + Labor Cost)
\$59,713.50	\$301,440	\$361,153.50

15. Reasons for Change in Burden

This is a revision of a previously approved collection. There is a ten percent increase in the burden since the last OMB approval based on an assumption that the cost of government equipment has increased in the last three to six years, when the estimated O&M cost was previously reported. Additionally, the 2013 hourly rate for a GS-7/step 1 employee (\$16.28) has increased slightly in the past three years.

16. Publication of Results

Collected information will not be published in any form.

17. Non-Display of OMB Expiration Date

This office requests that the expiration date for OMB approval of the information collection is displayed.

18. Exceptions to " Certification for Paperwork Reduction Submissions"

This office seeks no exception to the certification statement identified in Item 19 of the OMB Form 83-I.