

SUPPORTING STATEMENT – PART A

Application Forms Booklet, Naval Reserve Officers Training Corps Scholarship Program OMB 0703-0026

A. JUSTIFICATION

1. Need for the Information Collection

The authority to request this information is contained in: 5 U.S.C. § 301 (Authorizing Departmental Forms and Regulations); 10 U.S.C. §2103 (Eligibility for Membership), and Executive Order 9397 (Use of Social Security Numbers). 10 U.S.C. §2103 permits the Navy to provide financial assistance to eligible applicants. An assessment of an applicant's eligibility for a Naval Reserve Officers Training Corps (NROTC) Scholarship is necessary to ensure that the NROTC Selection Board has the information needed to select the best qualified candidates. Information includes, but is not limited to, the applicant's background, academic performance, extra circular activities, physical readiness, leadership experience and moral character. In order to make this assessment, it is necessary to have information from the applicant, high school administrators, teachers and other adults. This information supports an analysis of the applicant's eligibility for an NROTC Scholarship. 5 USC §301 allows the Department of the Navy to provide for regulations for the NROTC program and to preserve records. Executive Order 9397 allows a federal agency to utilize social security number to identify individuals.

2. Use of the Information

Members of the public who are high school students, prospective college students, and college students that are interested in applying for an NROTC Scholarship access an online application. Individuals who are interested are made aware of the NROTC scholarship program through word of mouth or sometimes through recruiters who visit schools to spread information about the program. The applicants access and fill out the application on-line by registering for a password-protected account at <http://www.nrotc.navy.mil/apply.html> Once registered, the applicant is then required to log in with their registered user ID and password in the Agency's internet access point via the following website:

https://www.netfocus.netc.navy.mil/nrotc/candidate_app/login.aspx .

Once the applicant has successfully authenticated, the applicant is sent to the first page of the NROTC Scholarship Application via the following link: https://www.netfocus.netc.navy.mil/nrotc/candidate_app/Personal.aspx. The online application consists of two forms: "NSTC 1533/101: Drug Statement for Naval Reserve Officer Training Corps Application," and "NSTC 1533/102 Debarment and Suspension

From Receipt of Federal Assistance Statement for National Naval Reserve Officers Training Corps Application.”

Three forms are optional: “NSTC 1533/112 Statement of Understanding, Navy”; “NSTC 1533/129 Statement of Understanding, Nurse”; and “NSTC 1533/154 Certifications and Statements of Understanding.” They are part of the application process but since they are just certifications or statements of understanding, the respondent is not providing new information. In addition, respondents are not given the opportunity to refute any information in the certification. Therefore, it is not included in the burden hours.

As part of the online application process, the applicant provides links to their application to high school administrators, teachers and other adults well acquainted with the applicant to complete online evaluations. The forms are: “NSTC 1533/155 Request for Secondary School Transcript”; “NSTC 1533/156 Math/Science/English Teacher Evaluation of Applicant”; “NSTC 1533/158 Other Official’s Evaluation of Applicant,”; and NSTC 1533/157 Applicant Interview form.

In cases where these individuals cannot access the website, they can get assistance from Navy Recruiters to find a way to fill out the forms if online is not an option. The completed applications are used by formal selection board to determine applicant's eligibility and qualifications for an NROTC Scholarship. Lack of such information would severely limit the NROTC Selection Board's knowledge of an applicant's potential for success in college.

If applicants are selected, there is a standard letter that is sent out but tailored to the applicant. If applicants are not selected, there is a standard letter that is sent out as well. Both letters are included in the PRA submission.

The Privacy Act Statement and Agency Disclosure Notice are stated at the top of each form. Regardless if the applicant fills out the form electronically or via hardcopy, it is listed on the form. On the current forms, there is an error in the burden for the Agency Disclosure Notice, which reads “3 hours and 30 minutes” instead of “2 hours and 30 minutes.” This is currently in the process of being amended. To compensate for this, a draft copy of the revised Agency Disclosure Notice has been included with the package submission to OMB. In addition, instructions will be developed for each of the forms in the near future.

Applicants are apprised of the status of their application via the website.

3. Use of Information Technology

99% of the applications are expected to be filled out and reviewed electronically. For individuals that cannot access the site, they will receive and return the form to the recruiter by hand or U.S. Mail.

4. Non-duplication

No similar/duplicated information is available in any other forms or documents used in the NROTC application process.

5. Burden on Small Business

No small businesses are burdened by this collection of information.

6. Less Frequent Collection

NROTC Scholarships are awarded on an annual basis at the start of each academic year. Applicants are required to complete the application for the academic year in which they apply. If the information was collected less frequently, the Navy would be unable to award new scholarships on an annual basis.

7. Paperwork Reduction Act Guidelines

There are no special circumstances that would require the collection to be conducted in a manner inconsistent with 5 CFR 1320.5(d)(2).

8. Consultation and Public Comments

PART A: Public Comments

The 60-Day FRN was published in the Federal Register on 09 Oct 2015 with the citation 80 FRN 61190. No public comments have been received.

The 30-Day FRN was published in the Federal Register on 31 October 2016 with the citation 81 FRN 74412.

PART B: Consultation

Periodic discussions are held among NROTC staff; Commander, Navy Recruiting Command Recruiters; and respondents to obtain input regarding the data collected. No complaints have been received about the application.

9. Gifts or Payment

No payment or gift will be provided to respondents.

10. Confidentiality

The Applicant is advised of the legal authority and purpose for the application in the Privacy Act statement located at the beginning of the application. The application data is stored on secure servers located in a secured Data Center with limited access to only authorized personnel at Saufley Data Center, Pensacola, FL. Authorized personnel with access to this information require a multi-factor authentication verification approach. Authorized personnel officially identified as an administrator role to this information must present to the secured server a registered user id, password and physical Common Access Card (CAC). The Applicant accesses the application via registration on a website and issued a password. Once an application has been electronically submitted by the applicant, it becomes a locked document and no further changes can be made. The submitted applications are accessed by a small group of Navy personnel with an authorized need to know and by the Selection Board members for evaluation of the application. The purpose of the forms is to determine eligibility for NROTC Scholarships. There are four separate portions of the application that must be provided by other individuals selected by the applicant (Officer Interview, two teacher evaluations, and counselor evaluation). These individuals are requested to provide information on, or to evaluate the applicant. Each individual may select confidentiality or decline it. It is agency policy to maintain confidentiality of these recommendations to enhance the likelihood of receiving completely honest evaluations. Correspondence with individual applicants for commissions, prospective applicants, and other interested individuals retained for two years and then destroyed, per SECNAV M-5210.1.

The privacy act statement and agency disclosure are listed on the forms. A draft copy of SORN N01130-1 and the PIA are included in the PRA submission.

11. Sensitive Questions

No information of a sensitive nature is required beyond that of race/ethnicity (which is optional), gender, and drug use/abuse. Social Security Number (SSN) is collected and required at the time of application to ensure proper identification of the applicants in situations where multiple applicants have the same name. An SSN justification memo is included in this PRA package. The information concerning race/ethnicity and gender is used for statistical analysis of the NROTC program. Minority applicants can be actively pursued to encourage submission of application. These items are essential to an efficient, cost effective, objectives-oriented recruiting campaign. No service or benefits are denied to potential applicants based on this

information. The drug statement is used to determine previous drug use and whether applicant meets Navy/Marine Corps requirements for a commissioning program.

With regard to the social security number required on the teacher evaluation form, the SSN is used to distinguish between applicants with the same name. This is covered in the SSN justification that has been submitted with the PRA package.

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)
NSTC 1533/101; NSTC 1533/102; NSTC 1533/158; NSTC 1533/157	14,000	4	56,000	20 minutes per form, (4 forms per respondent)	18,666 Hours
NSTC 1533/155 Request for Secondary School	14,000	1	14,000	20 minutes form	4,667 Hours

Transcript					
NSTC 1533/156 Math/Science/English Teacher Evaluation of Applicant	14,000 (2 Evaluations per applicant)	2	28,000	50 minutes	23,333 Hours
Total	14,000	7	98,000	2 hours 30 minutes	46,666 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)
NSTC 1533/101; NSTC 1533/102; NSTC 1533/158; NSTC 1533/157	56,000	80 mins	\$7.25/Hour	\$12.04	\$673,960
NSTC 1533/155 Request for Secondary School Transcript	14,000	20 min	\$27.00/Hour	\$9.00	\$126,000
NSTC 1533/156 Math/Science /English	28,000	50 minutes	\$27.00/Hour	\$22.50	\$630,000

Teacher Evaluation of Applicant					
Total	98,000	2 hours 30 minutes	\$20.41/Hour*	\$14.51*	\$1,429,960

The \$7.25 per hour wage estimate applied to the Respondent Hourly Wage for NSTC 1533/101, NSTC 1533/102, NSTC 1533/158, and NSTC 1533/157 is the federal minimum wage as reported by the U.S. Department of Labor as of October 2016 (<http://www.dol.gov/dol/topic/wages/index.htm>).

The \$27.00 per hour wage estimate is derived from the median annual salary (\$57,200) for secondary education teachers as reported by the Department of Labor as of October 2016 (<http://www.dol.gov/dol/topic/wages/index.htm>).

*This figure is an average, as it better reflects the typical respondent hourly wage than a summation.

13. Respondent Costs Other Than Burden Hour Costs

<u>Description</u>	<u>Estimated Cost per Response</u>	<u>Number of Responses</u>	<u>Total Cost</u>
Cost of Mailing Application	\$7.05	140	\$987,000

-

14. Cost to the Federal Government

	<u>Applications Processed</u>	<u>Total</u>
Number of Responses	14000	14000
Processing Time Per Response (in hours)	2	2
Hourly Wage of Worker(s)	\$21.00/hr*	\$21.00/hr

Processing Responses		
Cost to Process Each Response (Processing Time Per Response multiplied by Hourly Wage of Worker(s) Processing Responses)	\$42.00	\$42.00
Total Cost to Process Responses (Cost to Process Each response multiplied by number of responses	\$588,000.00	\$588,000.00

*This wage estimate is based on the salary of a General Schedule (GS) 6 employee as found at <https://www.opm.gov/policy-data-oversight/pay-leave/salaries-wages/2016/general-schedule-gs-salary-calculator/>.

Operational and Maintenance Costs						
Equipment	Printing	Postage	Software Purchases	Licensing Costs	Other	Total
N/A	N/A	N/A	N/A	N/A	\$750,000 for Costs of Operating	\$750,000.00

					the application Website	
--	--	--	--	--	-------------------------------	--

Total Cost to the Federal Government		
Operational and Maintenance Costs	Labor Cost to the Federal Government	Total Cost (O&M Costs + Labor Cost)
\$750,000.00	\$588,000.00	\$1,338,000.00

15. Reasons for Change in Burden

This is a reinstatement, with change, of a previously approved collection for which approval has expired. The change in burden, both from the previous approval and the 60-Day FRN, is due to a better evaluation of the respondents and their time.

16. Publication of Results

The results of this information collection will not be published. This information collection does not employ statistical methods.

17. Non-Display of OMB Expiration Date

Approval is not sought for avoiding display of the expiration date for OMB approval.

18. Exceptions to "Certification for Paperwork Reduction Submissions"

There are no exceptions being requested for Paperwork Reduction Act Submissions.

