SUPPORTING STATEMENT – PART A

Academic Certification for Marine Corps Officer Candidate Program - OMB 0703-0011

A. JUSTIFICATION

1. Need for the Information Collection

Information collection needed to verify a potential officer candidate's academic qualifications and mental qualifying scores. The authorities authorizing the collection of information is Title 10, USC 5042: Headquarters Marine Corps: general duties, MCO 1130.76C, "Conduct of Recruiting Operations," and MCRCO 1100.2, Marine Corps Recruiting Command Officer Commissioning Manual (MCRC OCM) which establishes the requirement to verify officer applicant's qualifications. Marine Corps Recruiting Command is responsible to the Commandant of the Marine Corps for the procurement of qualified individuals, to meet the established personnel strength levels, officer and enlisted, of the Marine Corps and Marine Corps Reserve. Under Title 10, USC 5042, Headquarters Marine Corps shall prepare for such employment of the Marine Corps, to include recruiting and maintaining of the Marine Corps. Under MCO 1130.76C, The Commanding General of MCRC is responsible for the implementation of total force recruiting policies and directives as established by the Department of Defense, Department of the Navy or Headquarters Marine Corps. MCRCO 1100.2 establishes the criteria for officer procurement and accessions as directed by the Commandant of the Marine Corps. In order to accomplish these officer procurement requirements the Office Selection Officer must prospect, screen and contract qualified individuals. This form is vital part of the process.

2. Use of the Information

The information is used to verify a potential officer candidate's academic qualifications and mental qualifying scores. When an applicant is interested in joining the Marine Corps as an Officer, they must contact a Marine Corps Officer Selection Officer (OSO). They can find their closest OSO online. They will contact the OSO via phone or email to set up an appointment. Once an applicant sets up an appointment, they will meet with the OSO in person, usually at the Officer Selection Office. An OSO will then conduct an initial interview with the applicant and will be asked to disclose where he or she attended college. An applicant may also go to https://www.marines.com/request-information to have an OSO contact them.   The OSO will go to the colleges or universities that the applicant listed during the initial interview.   They print NAVMC Form 10469, "Academic Certification for Marine Corps Officer Candidate Program," from the Naval Forms website. They take the form to the college or university of the applicant where a school official will fill out the form with information on the student's degree plan, major, credit hours, and grades. The respondents are not provided any letters, emails, or other communications when filling this information out. The school official will then sign the form, verifying the information to be true, and return it to the OSO in person. The agency disclosure notice and privacy act statement are listed at the top of the form for the school official to read. The applicant never touches this form in order to maintain the integrity of the information that is

provided.   The data from the NAVMC 10469 is scanned and uploaded into the Marine Corps Recruiting Command's Automated Commissioning Package (ACP) database. The form is included into a potential officer's application. Once this form is scanned into the ACP, the hard copy of the form is destroyed. The ACP is then uploaded into the Marine Corps Recruiting Command Administrative Portal, where the forms are stored permanently. The NAVMC 10469 is not added into the applicant's Official Military Personnel File (OMPF).

3. Use of Information Technology

Due to the nature of the request, NAVMC 10469 cannot be completed electronically and therefore, the percentage of responses collected electronically is zero. Authorized Marine Corps Recruiting Command personnel input the data from the form into the Marine Corps Recruiting Command's Automated Commissioning Package (ACP) database by scanning the documents and uploading them. Electronic submission is not possible at this time because of how the system is set up, but efforts are in progress to make this electronic.

4. Non-duplication

There is not information already available which can be used, or modified for use for the purposes of this collection.   NAVMC 10469 is the only form used to verify a potential officer candidate's academic qualifications and mental qualifying scores.

5. Burden on Small Business

This information does not impact small businesses or other small entities.

6. Less Frequent Collection

The collection of this data is mandated by the Marine Corps Recruiting Command Officer Commissioning Manual. Less frequent collections will not allow potential applicants to be considered for commissioning.

7. Paperwork Reduction Act Guidelines

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

8. Consultation and Public Comments

Part A: A 60-day notice for the proposed collection was posted in the Federal Register on October 9, 2015, 80 FR 61192.   No comments were received.

A 30-Day Federal Register Notice for the collection published on Friday, January 27, 2017. The 30-Day FRN citation is 82 FRN 8611.

Part B: MCRC consults with the Navy Command Training Center and other branch's service academies on a daily basis to ensure the most effective means of assessing Officers into the Marine Corps. It has been determined that the use of NAVMC 10469 is the most effective and accurate way to collect academic information from potential applicants.

9. <u>Gifts or Payment</u>

No gifts or payments are associated with the collection.

10. <u>Confidentiality</u>

Only authorized personnel are allowed access to data in the system. Access to the database is controlled by a secure login in the form of a user name and password and is restricted to individuals having a need to know to perform their official duties. The user must have a Common Access Card (CAC) in order to log into the work stations that are used to view the ACP. Data is stored on a secure database protected by firewalls, on CDs locked in a safe and secure servers that are protected by firewalls as well as records that are secured in cabinets and stored in a locked warehouse. Records are maintained in an area accessible only to authorized personnel. The terminals are in rooms with secured windows and the rooms are locked when not being used by authorized personnel. User identification codes and passwords known only by data input operators and their supervisors are required for access to the terminals. This terminal (Marine Corps Recruiting Information Support System) is CAC enabled, and cannot be accessed without one. This data collection is covered under SORN MO1133-3, http://dpcld.defense.gov/Privacy/SORNsIndex/DOD-wide-SORN-Article-View/Article/570628/m01133-3/. The Privacy Act Statement and Agency Disclosure Notice are listed on the form, and informs the respondent of the purpose of the form, and who will access the information and why. Per SECNAV M-5210.1, The Department of the Navy Records Management Manual, Officer Recruiting Records (SSIC 1131) hard copies of NAVMC 10469 will be retained at the OSO's, destroy when applicant is commissioned or 5 years after applicant is rejected, whichever is earlier.

A Privacy Impact Assessment (PIA) is required. A draft copy of the PIA has been provided with this package for OMB's review.

11. <u>Sensitive Questions</u>

The Social Security Number is collected on this form in order to ensure that the correct transcript is provided to the OSO from the university. A Social Security Justification Memo has been signed by the Privacy Act Officer, and has been submitted along with this 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)
Collection Instrument #1 NAVMC 10469	3500	1	3500	15 minutes	875
Total	3500	1	3500	15 minutes	875

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 Respondents multiplied by Response Time multiplied by Respondent Hourly Wage)
NAVMC 10469	3500	15 minutes	$16.25 This information comes from the Dept of Labor Website. We chose an office administrator (mid level) for the average respondent at a wage of $16.25 an hour. http://www.bls.gov/opub/reports/womens-earnings/archive/highlights-of-womens-earnings-in-2014.pdf (page 17).	$ 4.06	$14,218.75
Total	3500	15 minutes	$16.25	$4.06	$14,218.75

13. Respondent Costs Other Than Burden Hour Costs

There are no other costs to the respondent associated with this form. All forms are completed in front of an OSO.

14. Cost to the Federal Government

	Collection Instrument #1	Total
Number of Responses	3500	3500
Processing Time Per Response (in hours)	15 minutes	15 minutes
Hourly Wage of Worker(s) Processing Responses	$15.00 This info was taken from the OPM website, averaging for a GS 06 who processes the forms. https://www.opm.gov/policy-data-oversight/pay-leave/salaries-wages/salary-tables/pdf/2016/GS.pdf	$15.00
Cost to Process Each Response (Processing Time Per Response multiplied by Hourly Wage of Worker(s) Processing Responses)	$3.75	3.75
Total Cost to Process Responses (Cost to Process Each Response multiplied by Number of Responses	$13,125.00	$13,125.00

Operational and Maintenance Costs						
Equipment	Printing	Postage	Software Purchases	Licensing Costs	Other	Total
.10x3500 = $350.00	.05x3500 =$175.00	$0.00	$0.00	161.00x9 = $1,449.00	$0.00	$1,974.00

Total Cost to the Federal Government		
Operational and Maintenance Costs	Labor Cost to the Federal Government	Total Cost (O&M Costs + Labor Cost)
$1,974.00	$13,125.00	$15,099.00

15. Reasons for Change in Burden

There has been a change in burden hours requested since the last OMB approval. After reevaluating the program, it was determined that a lower number of burden hours and responses are required, due to the mission drawdown and also because the responses have decreased from 4,000 to 3,500.

16. Publication of Results

The results of the information collection will not be published.

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 for Paperwork Reduction Act Submission.