

## SUPPORTING STATEMENT - PART A

(Record of Military Processing – Armed Forces of the United States DD Form 1966/Request for Examination USMEPCOM Form 630-3A-E- OMB Number 0704-0173)

### 1. Need for the Information Collection

Title 10 U.S. Code, Sections 504, 505, 508, and 1012, Title 14, U.S. Code, Sections 351 and 632; and Title 50 U.S. Code, Appendix Section 451, and EO 9397 require applicants to meet standards for enlistment into the Armed Forces. This information collection is the basis for determining eligibility of applicants for enlistment in the Armed Forces and is needed to verify data given by the applicant and to determine his/her qualification of enlistment. The information collected aids in the determination of qualifications, terms of service, and grade in which a person, if eligible, will enter active duty or reserve status.

### 2. Use of the Information

The primary purpose of this information collection is to gather the necessary data for determining eligibility in the Armed Forces and for establishing personnel records on those enlisted. The USMEPCOM Form 680-3A-E is the applicant authorization to release medical information to the Military Entrance Processing Station (MEPS) to begin the process required to meet enlistment qualifications. The DD Form 1966 is the main source document for military enlistment or continued military service records. The information collected is used to feed other DoD and service-specific forms that later would be used to issue identification cards and receive benefits associated with military service.

The Military Services and the Coast Guard will use these data to reduce premature discharges by determining applicant eligibility for enlistment. The information collected on USMEPCOM Form 680-3A-E is transferred electronically into the DD Form 1966 after the applicant meets enlistment standards and decides to enlist. The DD Form 1966 is completed by the applicant and assisted by a Service recruiter, after an oral interview. The information is collected and processed within a one – to two – day period. The information collected accompanies the applicant throughout the enlistment process at the MEPS.

The data collected has assisted recruiters in determining whether applicants meet the necessary entrance standards for enlistment in the Armed Forces.

### 3. Use of Information Technology

Approximately 90% of all respondents provide the required information electronically. A small portion of minors are required to print out the form for their parent or legal guardian to sign, but the Department is working to increase the acceptability of electronic signatures for this population.

The DD Form 1966 is available on the DoD Electronic Forms Website in Fillable Adobe PDF files and used by the Military Entrance Processing Command (MEPCOM) Integrated Resource System (MIRS) at the MEPS. Recruiting stations able to use the form electronically will reduce the burden for not only the respondent, but for the recruiter as well. The MEPS has loaded the DD Form 1966 into the MEPCOM Integrated Resource System (MIRS) to enable the respondents to electronically complete this form. Strategic

planning has led to research and development for ongoing initiatives, including biometrics, towards the creation of an integrated system between the armed services and other agencies to share data electronically. This improvement will lessen the burden on moving paper between agencies and will ensure better accuracy of data. Progress of this on-going initiative is contingent upon funding availability.

4. Non-duplication

The information obtained through this collection is unique and is not already available for use or adaptation from another cleared source.

5. Burden on Small Businesses

This information collection does not impose a significant economic impact on a substantial number of small businesses or entities.

6. Less Frequent Collection

Information is collected only once per applicant. If collection was stopped, ability to make determinations for enlistment into the military would be hampered.

7. Paperwork Reduction Act Guidelines

This collection of information does not require 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: PUBLIC NOTICE

A 60-Day Federal Register Notice for the collection published on Tuesday, February 20, 2018. The 60-Day FRN citation is 83 FR 7169.

No relevant comments were received during the 60-Day Comment Period.

A 30-Day Federal Register Notice for the collection published on Tuesday, August 21, 2018. The 30-Day FRN citation is 83 FR 42261.

Part B: CONSULTATION

No additional consultation apart from soliciting public comments through the 60-Day Federal Register Noticed was conducted for this submission.

9. Gifts or Payment

No payments or gifts are being offered to respondents as an incentive to participate in the collection.

10. Confidentiality

Respondents are advised with the PAS on the form that their data are for OFFICIAL USE ONLY and will be maintained and used in strict confidence in accordance with Federal

law and regulations and those procedures are in place to protect the confidentiality of the information. The paper forms will be secured to protect PII in accordance with DoD regulations. The erroneous release of PII might cause legal action from individuals against DoD and/or the government.

System of Records Notice SORNS: The following System of Records Notice (SORNs) oversee the collection of the SSN for the DD Form 1966 and USMEPCOM Form 680-3A-E. Completed forms are covered by recruiting and official military personnel SORNS maintained by each of the Services. The DoD Blanket Routine Uses found at <http://dpcl.d.defense.gov/Privacy/SORNSIndex/Blanket-Routine-Uses/>, apply to this collection. Applicable SORNs:

Army:

<http://dpcl.d.defense.gov/Privacy/SORNSIndex/DOD-wide-SORN-Article-View/Article/570071/a0601-210a-usarec/>

Air Force:

<http://dpcl.d.defense.gov/Privacy/SORNSIndex/DOD-wide-SORN-Article-View/Article/569773/f036-aetc-f/>

Marine Corps:

<http://dpcl.d.defense.gov/Privacy/SORNSIndex/DOD-wide-SORN-Article-View/Article/570628/m01133-3/>

Navy:

<http://dpcl.d.defense.gov/Privacy/SORNSIndex/DOD-wide-SORN-Article-View/Article/570318/n01133-2/>

Coast Guard:

<http://www.gpo.gov/fdsys/pkg/FR-2011-08-10/html/2011-20225.htm>

A copy of the PIA, USMEPCOM Integrated Resource System (USMIRS), has been provided with this package for OMB's review.

The records will be retained in accordance with each recruiting and official military personnel SORNS.

#### 11. Sensitive Questions

Character and social adjustment questions: Question 24 through 26 on DD Form 1966, are required to preclude the enlistment of unsuitable people into the U.S. Armed Forces who may be a detriment to the preparedness of the military and the security of the United States. This information is used by the Services to determine applicant eligibility for enlistment. The questions are preceded by the following:

If "Yes", explain in Section VI, "REMARKS."

Sensitive Questions (i.e. race and ethnicity): Data collected on race and ethnicity is used throughout the application process as a means of validating the applicant's identity. The revised standards, per OMB Bulletin No.00-02, Guidance on Aggregation and Allocation of Data on Race for Use in Civil Rights Monitoring and Enforcement, [http://whitehouse.gov/omb/bulletins\\_b00-02/](http://whitehouse.gov/omb/bulletins_b00-02/) provides the recruiters with the necessary information to assist the applicants with properly completing the race and ethnicity blocks on the DD Form 1966. Religious preference information is voluntary, but is requested to determine the proper mix of chaplains in each Service. Marital status is used to determine appropriate pay and benefits. It is also used to determine the number of dependents, obligations and financial suitability of the applicant. Responses regarding gender are also requested to determine the total number of male and female applicants. Social Security Number (SSN) is requested to ensure accuracy of data on the specified individual applicant.

The DD Form 1966 is the genesis for the personnel record, the medical record, and the security records. The SSN is obtained and stored into the initial record (personnel, finance, medical, and security) for proofing, vetting, and maintaining unambiguous person identity for U.S. persons. With the SSN being used for personal identification in major DoD human resource systems (personnel, finance, and medical), it remains the only unique identifier that ensures the accuracy across all the systems to ensure proper data retrieval. The paper forms will be secured to protect Personally Identifiable Information (PII) in accordance to DoD regulations. Records are maintained in secure, limited access, or monitored areas. Physical entry by unauthorized persons is restricted through the use of locks, passwords, or other administrative procedures. Access to personal information is limited to those individuals who require the records to perform their official assigned duties.

## 12. Respondent Burden and its Labor Costs

### a. Estimation of Respondent Burden

#### 1. [DD Form 1966]

- a. Number of Respondents: 423,000
- b. Number of Responses Per Respondent: 1
- c. Number of Total Annual Responses: 423,000
- d. Response Time: 20 minutes
- e. Respondent Burden Hours: 141,000 hours

#### 2. [USMEPCOM FORM 680-3A-E]

- a. Number of Respondents: 423,000
- b. Number of Responses Per Respondent: 1
- c. Number of Total Annual Responses: 423,000
- d. Response Time: 22 minutes
- e. Respondent Burden Hours: 155,100 hours

#### 3. **Total Submission Burden** (Summation or average based on collection)

- a. Total Number of Respondents: 423,000
- b. Total Number of Annual Responses: 2
- c. Total Respondent Burden Hours: 296,100 hours

**b. Labor Cost of Respondent Burden**

**1. [DD Form 1966]**

- a. Number of Total Annual Responses: 423,000
- b. Response Time: 20 minutes
- c. Respondent Hourly Wage: \$7.25
- d. Labor Burden per Response: \$2.41
- e. Total Labor Burden: \$1,022,250

**2. [USMEPCOM FORM 680-3A-E]**

- a. Number of Total Annual Responses: 423,000
- b. Response Time: 22 minutes
- c. Respondent Hourly Wage: \$7.25
- d. Labor Burden per Response: \$2.66
- e. Total Labor Burden: \$1,124,475

**3. Overall Labor Burden**

- a. Total Number of Annual Responses: 846,000
- b. Total Labor Burden: \$2,164,725

The Respondent hourly wage was determined by using the Department of Labor Wage Website (<http://www.dol.gov/dol/topic/wages/index.htm>)

**13. Respondent Costs Other Than Burden Hour Costs**

There are no annualized costs to respondents other than the labor burden costs addressed in Section 12 of this document to complete this collection.

**14. Cost to the Federal Government**

**a. Labor Cost to the Federal Government**

**1. [DD Form 1966]**

- a. Number of Total Annual Responses: 423,000
- b. Processing Time per Response: 20 minutes
- c. Hourly Wage of Worker(s) Processing Responses: \$46.49
- d. Cost to Process Each Response: \$15.48
- e. Total Cost to Process Responses: \$6,555,089.93

**2. [USMEPCOM FORM 680-3A-E]**

- a. Number of Total Annual Responses: 423,000
- b. Processing Time per Response: 22 minutes
- c. Hourly Wage of Worker(s) Processing Responses: \$46.49
- d. Cost to Process Each Response: \$17.06

e. Total Cost to Process Responses: \$7,217,154.09

**3. Overall Labor Burden to Federal Government**

a. Total Number of Annual Responses: 846,000

b. Total Labor Burden: \$13,772,244.02

b. Operational and Maintenance Costs

- a. Equipment: \$0
- b. Printing: \$0
- c. Postage: \$0
- d. Software Purchases: \$0
- e. Licensing Costs: \$0
- f. Other: \$0
- g. Total: \$0

1. Total Operational and Maintenance Costs: \$0

2. Total Labor Cost to the Federal Government: \$13,772,244.02

3. Total Cost to the Federal Government: \$13,772,244.02

15. Reasons for Change in Burden

Revising estimates to accurately reflect the number of responses to the department, but due to automation the cost burden on the public is not increasing.

16. Publication of Results

The results of this information collection will not be published.

17. Non-Display of OMB Expiration Date

We are not seeking approval to omit the display of the expiration date of the OMB approval on the collection instrument.

18. Exceptions to "Certification for Paperwork Reduction Submissions"

We are not requesting any exemptions to the provisions stated in 5 CFR 1320.9.