

SUPPORTING STATEMENT - PART A

National Language Service Corps – 0704-0449

Summary of Changes of the Previously Approved Information Collection

- Discontinued the DD Form 2933 (National Language Service Corps Detailed Skills Self-Assessment)
- Burden decreased due to the elimination of the DD Form 2933

1. Need for the Information Collection

This statement is submitted to update and renew the National Language Service Corps' (NLSC) need for information collection in support of Section 1913 of Title 50 of the United States Code (U.S.C.) The NLSC concept is proven to meet not only the needs of Department of Defense (DoD) but the broader needs of the U.S. Government (USG). Section 1913 of Title 50 U.S.C., authorizes the Secretary of Defense to establish NLSC as a permanent program within the DoD.

The NLSC recruits from the general public and enroll individuals who would like to volunteer their language skills. The NLSC identifies U.S. citizens who can provide high levels of proficiency in foreign languages and cultural expertise critical to national security for short-term temporary assignments when other resources are not available. The NLSC will fill gaps between requirements of DoD or other departments or agencies of the United States and available language skills where government employees are required or desired. It is critical for the NLSC to continue to utilize members to fill these emergent needs. The NLSC will maintain a system whereby a pool of members with specific language skills can be readily referenced: DoD Directive 5124.2, Under Secretary of Defense for Personnel and Readiness (Attachment 3); 50 U.S.C. 1913, National Language Service Corps

2. Use of the Information

The NLSC will reach out to U. S. citizens (age 18 or over) who can read, listen, speak, and write in English and read, listen, write and speak at least one other specified language, generally at or above skill level 3 as described by the proficiency guidelines of the Federal Interagency Language Roundtable (ILR). The DoD and the Intelligence Community agencies use these guidelines as the basis for language skill requirements identification, position descriptions, readiness indices and language bonus pay systems. Therefore, the ILR proficiency guidelines represent a common metric used by USG agencies as a basis for policy, planning and human capital decisions in operational, mission critical areas where language is required.

A proficiency level is generally assigned to a person through an authorized language examination whereby examiners assign a level on a variety of performance criteria exemplified in the descriptive statements. For example, an individual is assigned level 3 if he or she is able to speak the language with sufficient structural accuracy and vocabulary to

participate effectively in most formal and informal conversations in practical, social and professional topics. The NLSC confirmed the validity of a self-assessment process for identifying acceptable candidates as a low-cost tool for enrolling the large number of members expected to join. NLSC will identify members with requisite language skills who can be mobilized as a short term, temporary federal employee to be able to provide a surge capability, and who are otherwise not available to the government.

The qualifications for NLSC membership are 1) U.S. citizenship; 2) at least 18 years of age; 3) fulfillment of selective service requirements; and 4) proficient in English and another language. The NLSC application ascertains answers to items 1-3 and collects information to allow NLSC staff to assess the potential for applicants to meet item 4. The NLSC expects to enroll 1,000 individuals annually who would like to volunteer their language expertise to satisfy their own desire to use their language skills and meet the NLSC objective to effectively bring these multilingual members to the DoD and federal agencies.

The DD Form 2932, National Language Service Corps Application, is the initial document used to collect information from individuals in the general public who are interested in becoming members of NLSC.

The NLSC Application contains a brief set of screening questions. Individuals are asked to provide basic information (age, citizenship, foreign language(s)), and if they meet eligibility criteria. The Application also requests Selective Service System registration as this is a requirement for federal employment. This information is required since NLSC members who volunteer to perform on assignments will become temporary federal employees. The form also asks for the source of language skills and whether the applicant has used the language professionally. It also asks for educational information to indicate where and how long the applicant spent learning their languages so as to assess the applicant's potential to meet NLSC language proficiency requirements.

Upon receipt by NLSC staff recruiters, the application is checked for completeness. If the individual meets the minimum requirements, they will receive an invitation to complete the remaining language-related supplemental documents. The remaining forms are used to specifically address language proficiency.

The DD Form 2934, National Language Service Corps Global Language Self-Assessment, provides an overall assessment of the applicant's foreign language ability. Information verification may be necessary at any time during the enrollment process to certify language skills for entry into the NLSC and perform quality assurance of the certification.

The NLSC will evaluate the language qualifications (English and foreign language) of applicants through a two-stage process. The first stage consists of the self-assessment instruments on DD Form 2934. The self-assessment approach has been scientifically validated as a screening procedure by the Center for Advanced Study of Language (CASL), and has been and will continue to be used to initially screen NLSC applicants for desired language skills. The NLSC concluded in its first five years that the DD Form 2934 is a valid

instrument for the measurement of language skills and should remain as part of the NLSC screening process.

3. Use of Information Technology

The NLSC currently estimates 90% of all applicants will initially complete the entire application via an online tool. A consolidated database is being created to ease the burden on respondents, particularly those renewing their membership in the NLSC. The NLSC website www.nlscorps.org, was selected to stay consistent with the branding of the organization. Full implementation of electronic authentication (eAuthentication) is in place for the online application. All online applicants are required to e-sign the NLSC Application. Members hired as temporary federal employees will follow approved e-signature practices as required by the Defense Human Resources Activity (DoDHRA) or other federal hiring authority.

When a valid application is received, a control number and auto-generated password will be assigned to each individual applying. The applicants will use the assigned numbers and passwords to complete and validate their documents online. The NLSC staff will use the control numbers as individual identifier for applicants. Upon initial login, applicants are prompted to personalize their password, including parameters. The NLSC servers have been granted authority to operate by the DoDHRA Chief Information Officer (CIO) and the DoD CIO. Data entry and collection, maintenance, and access will primarily be accomplished online.

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

The DoD cannot administer the NLSC without the ability to recruit and access members. If collection of this information was stopped, the NLSC's ability to maintain records and support current users and partners would be severely affected. These agencies span the length and breadth of the Federal Government.

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 (FRN) for the collection published on Monday, September 24, 2018. The 60-Day FRN citation is 83 FRN 48295.

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

A 30-Day Federal Register Notice for the collection published on Friday, November 26, 2018. The 30-Day FRN citation is 83 FRN 60411.

Part B: CONSULTATION

No additional consultation apart from soliciting public comments through the Federal Register 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

A Privacy Act Statement is provided to respondents at the top of both DD Forms and on the new NLSC Database.

A draft copy of the SORN "National Language Service Corps (NLSC) Records," DHRA 07, DoD, has been provided with this package for OMB's review.

A draft copy of the PIA, National Language Service Corps (NLSC) Records, has been provided with this package for OMB's review.

Records are maintained for four years before destruction. NLSC Charter Member Files, Temporary, Destroy/Delete 4 years after termination of membership. Application of Non-enrollees, Temporary, Destroy/Delete when 4 years old

11. Sensitive Questions

No questions considered sensitive are being asked in this collection.

12. Respondent Burden and its Labor Costs

Part A: ESTIMATION OF RESPONDENT BURDEN

- 1) National Language Service Corps
 - a) Number of Respondents: 1,600
 - b) Number of Responses Per Respondent: 1
 - c) Number of Total Annual Responses: 1,600
 - d) Response Time: 36 minutes.
 - e) Respondent Burden Hours: 960 hours

- 2) Total Submission Burden (Summation or average based on collection)
 - a) Total Number of Respondents: 1,600
 - b) Total Number of Annual Responses: 1,600
 - c) Total Respondent Burden Hours: 960 hours

Part B: LABOR COST OF RESPONDENT BURDEN

- 1) National Language Service Corps
 - a) Number of Total Annual Responses: 1,600
 - b) Response Time: 36 minutes.
 - c) Respondent Hourly Wage: \$7.25
 - d) Labor Burden per Response: \$4.35
 - e) Total Labor Burden: \$6,900

- 2) Overall Labor Burden
 - a) Total Number of Annual Responses: 1,600
 - b) Total Labor Burden: \$6,900

The Respondent hourly wage was determined by using the federal minimum wage of \$7.25/hr.

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

Part A: LABOR COST TO THE FEDERAL GOVERNMENT

- 1) National Language Service Corps
 - a) Number of Total Annual Responses: 1,600
 - b) Processing Time per Response: 5 minutes
 - c) Hourly Wage of Worker(s) Processing Responses : \$13.87
 - d) Cost to Process Each Response: \$1.16
 - e) Total Cost to Process Responses: \$1,856

- 2) Overall Labor Burden to the Federal Government
 - a) Total Number of Annual Responses: 1,600

b) Total Labor Burden: \$1,856

The cost to the government is based on the expectation that workers processing the collection will rank at the GS-5 level on the federal pay scale.

Part B: OPERATIONAL AND MAINTENANCE COSTS

1) Cost Categories

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

2) Total Operational and Maintenance Cost: \$0

Part C: TOTAL COST TO THE FEDERAL GOVERNMENT

1) Total Labor Cost to the Federal Government: \$1,856

2) Total Operational and Maintenance Costs: \$0

3) Total Cost to the Federal Government: \$1,856

15. Reasons for Change in Burden

The burden has decreased since the previous approval due to the elimination of a duplicate form and a better understanding of the number of new applicants who provide their information to the NLSC each year.

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.