SUPPORTING STATEMENT - PART A

(Education Verification for National Guard Enlistees – 0704-XXXX)

1. <u>Need for the Information Collection</u>

Title 10 U.S. Code Section 503 – Enlistments: recruiting campaigns; compilation of directory information.

2. <u>Use of the Information</u>

a. Army National Guard (ARNG) Recruiters who have begun processing an applicant, who is currently enrolled as a High School Junior or Senior, and has agreed to enter the Army National Guard will collect the projected graduation date, final day of school for current school year, and first day of school for the upcoming school year, if applicable, from the school Guidance Counselor. Parental consent to obtain information and transcript is required for an applicant considered a minor. The signed NGB Form 900 will be uploaded into the Army Recruiting Information Support System (ARISS) by the processing Recruiter. The NGB Form 900 may be printed and filled in manually. The Military Entrance Processing Station ARNG Guidance Counselor must use the information to establish the mandatory release date for any applicant who is a high school junior, prior to being enlisted into the ARNG. Once the form has been completed, there is no additional invitations associated with the information collected. Successfully completing this information will allow applicants an opportunity to enlist in the Army National Guard.

b. Army National Guard (ARNG) Recruiters who have begun processing an applicant who claims to be currently enrolled as a college student, and has agreed to enter the Army National Guard will need a training date scheduled at the conclusion of the current semester. In an effort to verify these applicants are enrolled and the actual date of the last day of the current semester, ARNG Recruiters will request information from a school official on the NGB Form 901. The signed NGB Form 901 will be uploaded into the Army Recruiting Information Support System (ARISS) by the processing Recruiter. The NGB Form 901 may be printed and filled in manually. The Military Entrance Processing Station ARNG Guidance Counselor must use the information to determine the date in which the applicant will ship to Army Initial Entry Training. Once the form has been completed, there is no additional invitations associated with the information collected. Successfully completing this information will allow applicants an opportunity to enlist in the Army National Guard.

3. <u>Use of Information Technology</u>

The information collected will be collected 90% electronically. The NGB Form 900 and 901 will be made available using the National Guard Publications website and available for download.

4. <u>Non-duplication</u>

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

5. <u>Burden on Small Businesses</u>

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

6. <u>Less Frequent Collection</u>

This collection of information is only required of applicants who desire to join the ARNG and are currently listed as high school juniors or seniors. Any other applicant is not subject to this collection of information.

7. <u>Paperwork Reduction Act Guidelines</u>

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. <u>Consultation and Public Comments</u>

Part A: PUBLIC NOTICE

A 60-Day Federal Register Notice for the collection published on Thursday, March 21, 2019. The 60-Day FRN citation is 84 FRN 10481.

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

A 30-Day Federal Register Notice for the collection published on Monday, June 10, 2019. The 30-Day FRN citation is 84 FRN 26823.

Part B: CONSULTATION

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

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

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

10. <u>Confidentiality</u>

The Privacy Act Statement is located on the first page of the NGB Form 900, immediately below the form title.

The System of Record Notice is available at:

http://dpcld.defense.gov/Privacy/SORNsIndex/DOD-wide-SORN-Article-View/Article/ 570074/a0601-210-ahrc.aspx

Enlisted eligibility records are destroyed upon reenlistment of individual. Inquiry records and other related documents are maintained for 7 years then destroyed.

11. <u>Sensitive Questions</u>

No questions considered sensitive are being asked in this collection.

12. <u>Respondent Burden and its Labor Costs</u>

a. Estimation of Respondent Burden

- 1. High School Verification and College Enrollment Verification
- a. Number of Respondents: 10,000
- b. Number of Responses Per Respondent: 1
- c. Number of Total Annual Responses: 10,000
- d. Response Time: 5 Mins
- e. Respondent Burden Hours: 833.33 hours

2. Total Submission Burden (Summation or average based on collection)

- a. Total Number of Respondents: 10,000
- b. Total Number of Annual Responses: 10,000
- c. Total Respondent Burden Hours: 833.33 hours

<u>b. Labor Cost of Respondent Burden</u>

Wages earned to complete the form at the current minimum wage is \$0.725

- 1. High School Verification and College Enrollment Verification
- a. Number of Total Annual Responses: 10,000
- b. Response Time: 5 mins
- c. Respondent Hourly Wage: \$7.25
- d. Labor Burden per Response: \$0.60
- e. Total Labor Burden: \$6,000

2. Overall Labor Burden

- a. Total Number of Annual Responses: 10,000
- b. Total Labor Burden: \$6,000

(P): Cite the source for all wage information used. State:

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

13. <u>Respondent Costs Other Than Burden Hour Costs</u>

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. <u>Cost to the Federal Government</u>

a. Labor Cost to the Federal Government

1. High School Verification and College Enrollment Verification

- a. Number of Total Annual Responses: 10,000
- b. Processing Time per Response: .1 hours
- c. Hourly Wage of Worker(s) Processing Responses : \$1.50
- d. Cost to Process Each Response: \$0.15
- e. Total Cost to Process Responses: \$150

2. Overall Labor Burden to Federal Government

- a. Total Number of Annual Responses 10,000
- b. Total Labor Burden: \$150

b. Operational and Maintenance Costs

(P): To determine Operational and Maintenance Costs, think of the incidental or miscellaneous costs to owning this collection. How much does equipment, printing, or postage for this collection cost? Are there any overhead costs for purchasing or licensing software? If a database or system is involved, how much money does it take to maintain the system? If you do have incur any Operational and Maintenance costs through this collection, please put "\$0" next to each category.

- a. <u>Equipment:</u> \$0
- b. <u>Printing:</u> \$.05
- c. <u>Postage:</u>\$0
- d. <u>Software Purchases:</u> \$0
- e. Licensing Costs: \$0
- f. <u>Other:</u>\$0
- g. <u>Total :</u> \$.05

1. Total Operational and Maintenance Costs: \$.05

2. Total Labor Cost to the Federal Government: \$150

3. Total Cost to the Federal Government \$150.05

15. <u>Reasons for Change in Burden</u>

This is a new collection with a new associated burden.

16. <u>Publication of Results</u>

The results of this information collection will not be published.

17. <u>Non-Display of OMB Expiration Date</u>

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

18. <u>Exceptions to "Certification for Paperwork Reduction Submissions"</u>

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