

SUPPORTING STATEMENT - PART A

JAG Corps Student Program or Direct Accession Application and Internship Program
Application: OMB Control Number 0703-XXXX

1. Need for the Information Collection

This information requirement is needed to determine the eligibility, competitive standing, and the scholastic and leadership potential of students and lawyers interested in the U.S. Navy Judge Advocate General's Corps (JAGC) Internship Program, Student Program or Direct Accessions Program

Without the data collection, the JAGC would not be able to determine if a student or lawyer was eligible for the applicable program. An analysis of the information collected is made by the Internship Selection Board or Accessions Selection Board in order to gauge the qualifications of individual candidates.

The JAGC applications are a critical tool in the recruitment and accessions process. On the website, the JAGC applications can transmit required information efficiently without the need for hard copies taking up unnecessary space. In addition to requiring a method of collecting information to assess applicants applying for an internship or commission in the JAGC, legal prescribing authorities for this collection are:

10 U.S.C. 531, Original appointments of commissioned officers.

10 U.S.C.532, Qualifications for original appointment as a commissioned officer: Provides specific qualifications for new naval officers.

10 U.S.C 541, Graduates of the United States Military, Naval, and Air Force Academies: Provides specific guidelines which apply to length of service requirements for Service Academy graduates.

10 U.S.C 5148, Judge Advocate General's Corps: Office of the Judge Advocate General; Judge Advocate General; appointment, term, emoluments, duties: Outlines the duties of the JAG, which include the authority to recruit and appoint new Judge Advocates.

10 U.S.C 5149, Office of the Judge Advocate General: Deputy Judge Advocate General; Assistant Judge Advocates General, 5150, Staff Corps of the Navy: Outlines the responsibilities of the JAG and allow for the collection of information related to officer candidates.

10 U.S.C. 5031, Office of the Chief of Naval Operations: function; composition: Outlines the authority for the CNO to collect information related to officer candidates and his ability to delegate that authority to the JAG.

10 U.S.C. 5032, Office of the Chief of Naval Operations: general duties: Further outlines the authority of the CNO to collect and hold officer candidate information.

5 U.S.C. 301, Departmental regulations: Further lays out specific requirements for the appointment of officers related to health and background requirement.

2. Use of the Information

Respondents are law students or practicing attorneys. The internship program offers law students the opportunity to intern with the JAGC while in law school. The Student Program offers law students the opportunity to apply for a commission to the JAGC. The Direct Accessions Program offers practicing attorneys the opportunity to apply for a commission to the JAGC.

The applications are available online at http://www.jag.navy.mil/careers_/careers/opportunities_da.html. All applications for the Student Program and Direct Accessions Programs are submitted online. Applications for the for the intern/extern program are also available online, however, the form, OPNAV 1070/3 Internship/Externship Program Application is downloaded and emailed to the Office of the Judge Advocate General (OJAG). Applicants are made aware of the website either through their own research, social media content from the JAGC Public Affairs Office, (PAO), awareness of the website from printed JAGC recruiting materials, awareness of the website from verbal communications by JAGC recruiters or others familiar with the programs, or in response to direct inquiries by applicants to JAGC recruiting officers. The military personnel department of OJAG receives information gathered on this site. The information is stored on a secure server maintained by OJAG. The information is stored until the applicant has gone through a selection process.

a. Student Program/Direct Accessions Program

In addition to submission of the application and upload of supporting documentation, applicants must request a separate in-person interview from the responsible JAGC recruiting officer in the local area of responsibility. The interview is arranged and conducted by two available active duty JAGs (with exception), certified by the JAGC to conduct applicant interviews, with proprietary questions not derived from the applications. Interviews last approximately one-hour and are conducted at the closest JAGC office, closest Naval Recruiting District office, or on-site at the applicable recruiting event. After the application deadline, a board meets to Professionally Recommend applicants. Approximately ten weeks after the application deadline, results are provided via a status change on the application website. In addition, selected applicants are notified individually of their Professional Recommendation by email and telephone and move on to Phase Two.

In Phase Two, Professionally Recommended applicants are considered Professionally Recommended for commissioning and begin the commissioning process with a local Navy Recruiting Command recruiting officer, who is provided information from the online

application. The applicant is required to complete a medical exam and security investigation. Upon successful completion of both, the applicant is offered a commission.

b. Internship Program

Upon receipt of the application and supporting documentation, the Internship Selection Board selects primary and alternate law students for offers of voluntary summer internship positions at JAGC offices worldwide. Notification is made via email and telephone.

3. Use of Information Technology

100% of responses are submitted electronically via the JAG website, and in the case of the intern/extern program, are submitted through email.

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

This information is collected semi-annually. If the JAG Corps could not collect this data at a semi-annual frequency, it would degrade the JAG Corps' ability to recruit and select the best individuals to intern or commission with the JAGC.

7. Paperwork Reduction Act Guidelines

This collection of information does not require collection to be conducted in a manner inconsistent with 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, March 12, 2019. The 60-Day FRN citation is 84 FRN 8845.

A 30-Day Federal Register Notice for the collection published on Thursday, June 20, 2019. The 30-Day FRN citation is 84 FRN 28793.

Part B: CONSULTATION. JAG applicants are invited to submit anonymous recommendations to the application. Additionally, new Judge Advocates are encouraged to submit anonymous recommendations on the Class Climate website or by emailing SASP@navy.mil.

9. Gifts or Payment

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

10. Confidentiality

The collection instruments for the application require a Privacy Act Statement (PAS) statement. The PAS is located at the top of the OPNAV 1070/3 form and the beginning of the JAG online application.

A System of Record Notice (SORN) is required for this collection. SORN, N01070-1, Judge Advocate General Corps Officer Personnel Information System (JAGPERS), and can be accessed at: <http://dpcl.d.defense.gov/Privacy/SORNsIndex/DOD-wide-SORN-Article->

RETENTION AND DISPOSAL OF RECORDS: Upon release from active duty, records are kept three years and then destroyed. Upon retirement from active duty, records are maintained indefinitely.

The Agency Disclosure Notice is listed at the top of each collection instrument

A Privacy Impact Assessment (PIA) is required. The PIA, Judge Advocate General Personnel System (JAGPERS), can be viewed at: <http://www.doncio.navy.mil/contentview.aspx?id=678>

11. Sensitive Questions

All applicants are given the option (not mandatory) of providing ethnic and racial information, which is collected in compliance with guidance from OMB. This data is collected for statistical purposes to analyze the effectiveness of specific recruiting programs.

Social Security Numbers are collected and a Social Security Number Justification Memo is included in the submission package to OMB.

12. Respondent Burden and its Labor Costs

a. Estimation of Respondent Burden

1. JAGC Student Program/Direct Accession Application

- a. Number of Respondents: 800
- b. Number of Responses Per Respondent: 1
- c. Number of Total Annual Responses: 800
- d. Response Time: 2 hours
- e. Respondent Burden Hours: 1600 hours

2. OPNAV 1070/3 Internship/Externship Program Application

- a. Number of Respondents: 100
- b. Number of Responses Per Respondent: 1
- c. Number of Total Annual Responses: 100
- d. Response Time: 1 hour
- e. Respondent Burden Hours: 100 hours

3. Structured Interviews

- a. Number of Respondents: 500
- b. Number of Responses Per Respondent: 1
- c. Number of Total Annual Responses: 500
- d. Response Time: 1 hour
- e. Respondent Burden Hours: 500

4. Total Submission Burden

- a. Total Number of Respondents: 1400
- b. Total Number of Annual Responses: 1400
- c. Total Respondent Burden Hours: 2200 hours

b. Labor Cost of Respondent Burden

1. JAGC Student Program/Direct Accession Application

- a. Number of Total Annual Responses: 800
- b. Response Time: 2 hours
- c. Respondent Hourly Wage: \$7.25
- d. Labor Burden per Response: \$14.50
- e. Total Labor Burden: \$11,600.00

2. OPNAV 1070/3 Internship/Externship Program Application

- a. Number of Total Annual Responses: 100
- b. Response Time: 1 hour
- c. Respondent Hourly Wage: \$7.25
- d. Labor Burden per Response: \$7.25
- e. Total Labor Burden: \$725.00

3. Structured Interviews

- a. Number of Total Annual Responses: 500
- b. Response Time: 1 hour
- c. Respondent Hourly Wage: \$7.25

- d. Labor Burden per Response: \$7.25
- e. Total Labor Burden: \$3,625.00

4. Overall Labor Burden

- a. Total Number of Annual Responses: 1400
- b. Total Labor Burden: \$15,950.00

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. JAG Student Program/Direct Accession Application

- a. Number of Total Annual Responses: 800
- b. Processing Time per Response: 1 hour
- c. Hourly Wage of Worker(s) Processing Responses: \$25.00
- d. Cost to Process Each Response: \$25.00
- e. Total Cost to Process Responses: \$20,000.00

2. OPNAV 1070/3 Internship/Externship Program Application

- a. Number of Total Annual Responses: 100
- b. Processing Time per Response: 1 hour
- c. Hourly Wage of Worker(s) Processing Responses: \$25.00
- d. Cost to Process Each Response: \$25.00
- e. Total Cost to Process Responses: \$2,500.00

3. Structured Interviews

- a. Number of Total Annual Responses: 500
- b. Processing Time per Response: 1 hour
- c. Hourly Wage of Worker(s) Processing Responses: \$25.00
- d. Cost to Process Each Response: \$25.00
- e. Total Cost to Process Responses: \$12,500.00

4. Overall Labor Burden to Federal Government

- a. Total Number of Annual Responses: 1400
- b. Total Labor Burden: \$35,000.00

The hourly wage was determined by using the Department of Defense pay scale. Website (<http://militarypay.defense.gov/Pay.aspx>)

b. Operational and Maintenance Costs

- a. Equipment: \$0.00
- b. Printing: \$0.00
- c. Postage: \$0.00
- d. Software Purchases: \$800.00
- e. Licensing Costs: \$0.00
- f. Other: \$0.00
- g. Total: \$0.00

- 1. Total Operational and Maintenance Costs: \$800.00
- 2. Total Labor Cost to the Federal Government: \$35,000.00
- 3. Total Cost to the Federal Government: \$35,800.00

15. Reasons for Change in Burden

This is a new collection with a new associated burden.

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 5CFR 1320.9.