

## SUPPORTING STATEMENT - PART A

### Application for Commission in the U.S. Navy/U.S. Naval Reserve - 0703-0029

#### Summary of Changes from Previously Approved Collection

- New IC added, NAVCRUIT Form 1130/104, “United States Navy Tattoo Screening Certificate
- Estimated number of respondents for NAVCRUIT Form increased from 14,000 to 24,000 due to the Navy’s increased requirement of meeting its recruiting goal.

#### A. JUSTIFICATION

##### 1. Need for the Information Collection

All persons interested in entering the U.S. Navy or U.S. Navy Reserve in a commissioned status must provide various personal data in order for a Selection Board to determine their qualifications for naval service and for specific fields of endeavor that the applicant intends to pursue. Title 10, USC 591 “Reserve Components: Qualifications” establishes the qualifications to become an officer of a reserve component. Title 10, USC 12209 “Officer Candidates”; enlisted reserve provides information on enlisted reserves to be selected for training as officer candidates. Title 10, USC 2107 “Financial Assistance Program for Specially Selected Members”, establishes the qualifications for financial assistance for specially selected members. Title 10, USC 6019 “Citizenship of Officers of Vessels” establishes that officers of vessels must be U.S. citizens.

##### 2. Use of the Information

The NAVCRUIT 1131/238 form, “Application Processing and Summary Record Information” is collected from any persons that are interested in joining the U.S. Navy or Navy reserve. The information collected includes personal information, past military service, educational status, physical fitness and swimming ability, illegal activities, professional licenses, flying experience, foreign language skills, and a motivational statement on why they are considering an officer commission. In order to apply for accession into the Navy, respondents must complete NAVCRUIT 1131/238. Respondents may fill out the form electronically and submit it to a Recruiter or complete the form electronically at a recruiter’s office. Respondents can locate a recruiter’s contact information, i.e. phone number and email address, by visiting <http://www.navy.com/>. Respondents can also go into a Navy Recruiting center by locating the Navy Recruiting center’s physical address at the following website: <http://www.navy.com/>.

The recruiter will ensure the applicant reads the Privacy Act Statement and Agency Disclosure notice that is listed at the top of the form. The recruiter will complete the form

electronically via signature with their Common Access Card (CAC) card and will print the form for the applicant to sign, again ensuring the applicant has read the form to include the privacy act statement and agency disclosure statement. The form is then forwarded by the recruiter to the Navy Recruiting Command (NAVCRUITCOM) application processor via Web Recruiting Tools (WebRTools). The form is then uploaded to the program manager to determine if the package is complete. The Program Manager moves the documents via WebRTools to the Community Manager to be presented to the selection board responsible for the program that the individual is applying for. The information is assessed by a Selection Board to determine the applicant's qualifications for a commission in the U.S. Navy or Naval Reserve. If it is determined by the selection board that the candidate fits the needs of the Navy, then the package is returned to NAVCRUITCOM for commissioning. If the board determines that the individual is not eligible, then the package is filed, not waiver eligible, and retained on file for two years.

The NAVCRUIT 1130/104 form, "United States Navy Tattoo Screening Certificate" is used for collecting information for any persons that are interested in joining the U.S. Navy or Navy Reserve. The information collected includes an applicant's personal information (name and location of bodily tattoos/body art/brands) to determine whether tattoos/body art/brands meets Navy accession requirements for content, location, size and cosmetic. The applicant can be anyone that has tattoos/body art/brands who are seeking a commission or enlistment into the Navy or Navy Reserves. Navy recruiting personnel shall conduct a screening for all tattoos, body art and branding. This requires that all tattoos, body art and branding must be seen, either directly or via photographic documentation, unless located in a private area on the applicant. In those cases, it will be necessary to rely on the applicant and medical personnel to describe the tattoo. Screenings will be accomplished with the use of the Tattoo Screening Certificate (NAVCRUIT 1130/104), Report of Medical Examination (DD Form 2808), and applicant's personal statement(s) describing the content, meaning and/or symbolism and rationale for obtaining each tattoo, body art, or brand. The completed certificate shall be included as part of the applicant's enlisted service record and a copy also placed in the applicant's residual file.

Recruiters must brief applicants with tattoos, body art, or brands they will be screened by Navy Recruiting personnel. Applicants must be informed that photographs may be taken and by whom, and ensure they have proper clothing to wear in order for the screening process to be conducted properly. They shall also read and sign the NAVCRUIT 1130/104 acknowledging the screening process. In every case, two recruiting personnel (one must be of the same gender as the applicant) will be present to view the tattoo and/or take a photograph. This will be accomplished in a location that provides the applicant with privacy. Photographs must not include the applicant's face. Photographs are treated as PII and may only be taken by NRD personnel (military or civilian) using Navy issued equipment. Personal equipment may not be used (i.e., cell phone, camera, tablet, etc.)

Commanding Officers shall conduct an standardized interview (face-to-face or telephonic) with any applicant who possesses tattoos, body art, or brands and deny enlistment to those whose tattoos, body art, or brands are considered inappropriate for members of the Navy. A list of some interview questions is provided on a separate word document with this package. At any point during the screening process, applicants determined to have tattoos, body art, or

brands that do not meet the criteria stated in this policy will be disqualified and not allowed to process for Navy enlistment.

### 3. Use of Information Technology

For NAVCRUIT 1131/238, Application Processing and Summary Record form is 100% electronic with the exception of printing. The reason applicants have to manually sign is because they do not have access to government systems and are without possession of a CAC.

For NAVCRUIT 1130/104, United States Navy Tattoo Screening Certificate, 0% is collected electronically. Information is manually gathered and uploaded into WebTools. This form is manual and not electronic at all. It is difficult to make electronic because applicants have to fill it out manually by putting in their information and indicating specifically on pictures of the body where their tattoos are located with full descriptions.

For the overall information collection, 50% is collected electronically.

### 4. Non-duplication

There is not information already available, which can be used, or modified for use for the purposes of this collection. NAVCRUIT 1131/238 is the first form that respondents fill out when interested in the U.S. Navy or Navy Reserve and NAVCRUIT 1130/104 is the form, which those respondents, who have tattoos, fill out when interested in the U.S. Navy or Navy Reserve.

### 5. Burden on Small Business

The collection of information does not affect small business or other small entities.

### 6. Less Frequent Collection

The collection of information is based on an individual's desire to apply for a commission and the need to adequately staff the U.S. Navy and U.S. Navy Reserve. Without this information on one or both (if applicable) forms, there would be no basis by which to evaluate the applicant for commission. Information is collected on an "on occasion" basis; therefore, it is not possible to reduce the frequency of collection.

### 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, July 29, 2019. The 60-Day FRN citation is 84 FRN 36593.

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

A 30-Day Federal Register Notice for the collection published on Monday, September 30, 2019. The 30-Day FRN citation is 84 FRN 51529.

#### 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 payment or gift will be provided to respondents.

#### 10. Confidentiality

A Privacy Act Statement (PAS) is required, and it is listed on both of the forms.

A Systems of Records Notice (SORN) is required and draft SORN 1130-1 has been provided with this package for OMB's review.

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

#### Records Retention and Disposition Schedule:

Records are retained and destroyed in accordance to the Record Management Manual (SECNAV M-5210.1). There are various requirements under this regulation for record retention and disposal, which depend on the type of record in question.

For officer recruiting records, control card records and summary record forms will be destroyed either when an applicant is commissioned or five years after the applicant is rejected, whichever is earlier. Withdrawn or rejected applications for commission will be destroyed after rejection determination is made by Commander, Navy Recruiting Command. Correspondence with the individual applicants for commission, prospective applicants, or other interested individuals will be destroyed after six months.

For enlisted recruiting records, correspondence with individuals requesting general information regarding enlistment or reenlistment will be destroyed after two years. Congressional and low quality recruit reports will be destroyed after two years. Pre-enlistment and enlistment papers for personnel (including investigations, medical examinations, parental consents, birth certificates, and waivers) will be transferred to FRC when one year old and

destroyed when after four years. Card (summary) records or individual data cards of accepted and rejected applicants for enlistment in the Naval Services will be destroyed after five years.

Additionally, the updated record retention schedule broadly lists that all documents accolated with SSIC 100-29 be destroyed when five years old.

Records are destroyed by shredding, burning, degaussing, and erasing.

## 11. Sensitive Questions

The NAVCRUIT 1131/238 form contains all of the information needed to implement the new Officer Service Record once the individual is commissioned. It is paramount to acquire the applicants SSN. If the applicants SSN is not included, the individuals pay and IRS account cannot be established. An SSN justification memorandum is provided with this package for OMB's review. Sex, Race and Ethnicity are collected to ensure that a diverse cadre of personnel are included in the U.S. Navy's total force structure. Under Section 9, on the NAVCRUIT 1131/238 Illegal Activities; this section attempts to ascertain whether the applicants' activities are conducive to good order and discipline. Drug use and alcohol abuse will interfere with the individual's ability to perform their job assignment. The NAVCRUIT 1130/104 form contains personal information as well. While it does not bear the SSN, it has other personal identifiable information particular to the applicant, and will be treated as sensitive for official use only. This form is applicable to those applicants who have tattoos, and those applicants are required, upon being briefed, to provide that information for the recruiter to fill out the form.

## 12. Respondent Burden and its Labor Costs

### Part A: ESTIMATION OF RESPONDENT BURDEN

- 1) NAVCRUIT 1131/238, Application Processing and Summary Record
  - a) Number of Respondents: 24,000
  - b) Number of Responses Per Respondent: 1 hour
  - c) Number of Total Annual Responses: 24,000
  - d) Response Time: 1 hour
  - e) Respondent Burden Hours: 24,000 hours
  
- 1) NAVCRUIT 1130/104, United States Navy Tattoo Screening Certificate
  - a) Number of Respondents: 12,000
  - b) Number of Responses Per Respondent: 30 minutes
  - c) Number of Total Annual Responses: 12,000
  - d) Response Time: 30 minutes
  - e) Respondent Burden Hours: 6,000 hours

- 2) Total Submission Burden
  - a) Total Number of Respondents: 24,000
  - b) Total Number of Annual Responses: 36,0000
  - c) Total Respondent Burden Hours: 30,000 hours

Part B: LABOR COST OF RESPONDENT BURDEN

- 1) NAVCRUIT 1131/238, Application Processing and Summary Record
  - a) Number of Total Annual Responses: 24,000
  - b) Response Time: 1 hour
  - c) Respondent Hourly Wage: \$7.25
  - d) Labor Burden per Response: \$7.25
  - e) Total Labor Burden: \$174,000.00

- 1) NAVCRUIT 1130/104, United States Navy Tattoo Screening Certificate
  - a) Number of Total Annual Responses: 12,000
  - b) Response Time: 30 minutes
  - c) Respondent Hourly Wage: \$7.25
  - d) Labor Burden per Response: \$3.625
  - e) Total Labor Burden: \$43,500

- 2) Overall Labor Burden
  - a. Total Number of Annual Responses: 36,000
  - b. Total Labor Burden: \$217,500.00

The Respondent hourly wage was determined by using the [Department of Labor Wage Website] <https://www.dol.gov/general/topic/wages/minimumwage>.

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) NAVCRUIT 1131/238, Application Processing and Summary Record

- a) Number of Total Annual Responses: 24,000
  - b) Processing Time per Response: 1 hour
  - c) Hourly Wage of Worker(s) Processing Responses: \$22.50
  - d) Cost to Process Each Response: \$22.50
  - e) Total Cost to Process Responses: \$540,000.00
- 1) NAVCRUIT 1130/104, United States Navy Tattoo Screening Certificate
    - a) Number of Total Annual Responses: 12,000
    - b) Processing Time per Response: 30 minutes
    - c) Hourly Wage of Worker(s) Processing Responses: \$22.50
    - d) Cost to Process Each Response: \$11.25
    - e) Total Cost to Process Response: \$135,000.00
- 1) Overall Labor Burden to the Federal Government
    - a) Total Number of Annual Responses: 36,000
    - b) Total Labor Burden: \$675,000.00

**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: \$2,850.00 (system maintenance for this form)
- 2) Total Operational and Maintenance Cost: \$2,850.00

**Part C: TOTAL COST TO THE FEDERAL GOVERNMENT**

- 1) Total Labor Cost to the Federal Government: \$675,000.00
- 2) Total Operational and Maintenance Costs: \$2,850.00
- 3) Total Cost to the Federal Government: \$677,850.00

15. Reasons for Change in Burden

The approved collection from 2016, reported an annual number of respondents for the NAVCRUIT 1131/238, Application Processing and Summary Record (APSR), as 14,000. Over

the course of three years, the response time is the same at an hour for the NAVCRUIT 1131/238, but the number of respondents is now approximately 24,000 annually. The change is a result of the Navy's increased requirement of meeting its recruiting goal. From the 24,000 respondents filling out the APSR, 12,000 respondents fill out an additional form, NAVCRUIT 1130/104, U.S. Navy Tattoo Screening Certificate. The response time for it the NAVCRUIT 1130/104 is 30 minutes.

The difference is an adjustment increase of 16,000 because of both the increased requirement of meeting goal and because of the increase of responses with adding the NAVCRUIT 1130/104, which added 12,000 responses at 30 minutes a response making the total increase of 16,000.

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.