

## SUPPORTING STATEMENT - PART A

OMB Control Number 0704-0290, Armed Forces Participation in Public Events

### 1. Need for the Information Collection

Section 113 of title 10, Secretary of Defense, paragraph (c) (1)(A) through (B) notes the Secretary of Defense must submit a report to the President and the Congress on accomplishments of each military department, noting elimination of unnecessary duplication. In order to be good stewards of taxpayers' dollars, DoD units and agencies must collect information from event sponsors who request military support per DoD Instruction 5410.19, paragraph 6.4, "The DoD Components shall use current DoD support request forms, such as DD Form 2535, "Request for Military Aerial Support," and DD Form 2536, "Request for Armed Forces Participation in Public Events (Non-aviation)," in evaluating and processing requests from event sponsors for support by the Military Services in community relations activities. The information entered into those forms by the sponsors of an event must provide sufficient information for evaluating the level of DoD support applicable for the event and overall compliance with the requirements of this Instruction." If forms are not properly completed, Military Services will not be able to ascertain if events are eligible for support or if duplicative support is being requested for a single event. Use of these forms by all Military Departments provides uniformity to ensure appropriate information is collected regarding military support, which helps streamline the process. If the forms are not completed in their entirety, the processing time would be hindered because Military Services would not be able to determine whether desired military support is available or appropriate for the request. Furthermore, proceeding with an incomplete aviation request form could create an unnecessary safety hazard at a public event. In addition, DoDI 5410.19, paragraph 6.5 states, "Requests from local event sponsors for community relations support by the Military Services shall be addressed to the nearest military installation and forwarded, if required, with applicable recommendations, to the applicable approval level through normal chain of command procedures."

### 2. Use of the Information

Event sponsors who request aviation or non-aviation military support for community events complete DD Forms 2535 or 2536, found on line at <http://www.dtic.mil/whs/directives/forms/eforms/> for Military Department consideration. Once the forms are completed, the respondents have several options noted on the back of the forms for submitting their requests to the closest military installation or appropriate Military Service. Most requests are submitted online. Once information has been submitted, installation and command public affairs officers who receive the data will use the collected information to evaluate public affairs requests. The community relations staff will compare the information against DoD standards to determine if Armed Forces participation is authorized and then determine if assets are available.

3. Use of Information Technology

About ninety percent of the data collected is done so electronically.

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

DoD will be unable to conduct its community relations program if it cannot collect information necessary to evaluate the propriety of military participation in public events. Collection cannot be conducted less frequently because each request is, in and of itself, unique and must be evaluated on a case-by-case basis.

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 Thursday, July 25, 2019. The 60-Day FRN citation is 84 FRN 35858.

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 51528.

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 not required for this collection because we are not requesting individuals to furnish personal information for a system of records.

A System of Record Notice (SORN) is not required for this collection because records are not retrievable by PII.

A Privacy Impact Assessment (PIA) is not required for this collection because PII is not being collected electronically.

The forms were reviewed by the Records Management Office, which noted forms should be retained in accordance with Military Department Record Management instructions.

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) Collection Instrument(s)

DD Form 2536

- a) Number of Respondents: 45,000
- b) Number of Responses Per Respondent: 1
- c) Number of Total Annual Responses: 45,000
- d) Response Time: 20 Mins
- e) Respondent Burden Hours: 14,850 hours

2) Collection Instrument(s)

DD Form 2535

- f) Number of Respondents: 6,000
- g) Number of Responses Per Respondent: 1
- h) Number of Total Annual Responses: 6,000
- i) Response Time: 30 Mins
- j) Respondent Burden Hours: 3,000 hours

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

- a) Total Number of Respondents: 51,000

- b) Total Number of Annual Responses: 51,000
- c) Total Respondent Burden Hours: 17850 hours

Part B: LABOR COST OF RESPONDENT BURDEN

1) Collection Instrument(s)

DD Form 2536

- a) Number of Total Annual Responses: 45,000
- b) Response Time: 20 Mins
- c) Respondent Hourly Wage: \$13.72
- d) Labor Burden per Response: \$4.53
- e) Total Labor Burden: \$203,742

2) DD Form 2535

- a) Number of Total Annual Responses: 45,000
- b) Response Time: 30 Mins
- c) Respondent Hourly Wage: \$13.72
- d) Labor Burden per Response: \$6.86
- e) Total Labor Burden: \$41,160

3) Overall Labor Burden

- a) Total Number of Annual Responses: 51,000
- b) Total Labor Burden (*P: add all "e's" in this section*): \$249,007.50

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

Part A: LABOR COST TO THE FEDERAL GOVERNMENT

1) Collection Instrument(s)

DD Form 2536

- a) Number of Total Annual Responses: 45,000
- b) Processing Time per Response: 20 Mins
- c) Hourly Wage of Worker(s) Processing Responses: \$16.77
- d) Cost to Process Each Response: \$5.58
- e) Total Cost to Process Responses: \$251,100

2) Collection Instrument(s)

DD Form 2535

- f) Number of Total Annual Responses: 6,000
  - g) Processing Time per Response: 30 Mins
  - h) Hourly Wage of Worker(s) Processing Responses: \$16.77
  - i) Cost to Process Each Response: \$8.39
  - j) Total Cost to Process Responses: \$50,340
- 3) Overall Labor Burden to the Federal Government
- a) Total Number of Annual Responses: 51,000
  - b) Total Labor Burden: \$150,720

Part B: OPERATIONAL AND MAINTENANCE COSTS

- 1) Cost Categories
- a) Equipment: \$59,713.50
  - b) Printing: \$0
  - c) Postage: \$0
  - d) Software Purchases: \$0
  - e) Licensing Costs: \$0
  - f) Other: \$0
- 2) Total Operational and Maintenance Cost: \$59,713.50

Part C: TOTAL COST TO THE FEDERAL GOVERNMENT

- 1) Total Labor Cost to the Federal Government: \$301,440
- 2) Total Operational and Maintenance Costs: \$59,713.50
- 3) Total Cost to the Federal Government: \$361,153.50

15. Reasons for Change in Burden

There has been no change in burden since the last approval.

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.