

SUPPORTING STATEMENT - PART A

NAF Retail Point of Sale Systems (RPOS) – OMB Control Number 0703-XXXX

1. Need for the Information Collection

This information system will provide a means to manage and administer a robust Marine Corps Community Services (MCCS) retail point of sale system to control sales and capture and process customer orders and transactions for the Marine Corps Exchanges, package stores, Marine Marts, and Uniform Shops.

The information collection is needed to manage and administer retail sales in an effective and efficient manner to streamline service delivery; improve customer experience; and increase retention rates, utilization, and sales.

10 U.S.C. 2481, Defense Commissary and Exchange Systems: Existence and Purpose, provides that a world-wide system of stores shall be operated to enhance the quality of life of eligible beneficiaries by providing high quality products, discount savings to patrons, and high levels of customer satisfaction.

E.O. 13571, Streamlining Service Delivery and Improving Customer Service, provides that agencies should develop a customer service plan to provide services in a manner that seeks to streamline service delivery, improve the experience of its customers, and reduce the need for customer calls and inquiries.

DoDI 1330.21, Armed Services Exchange Regulations prescribes procedures and assigns responsibilities for operating Armed Services Exchanges.

MCO 1700.30, Marine Corps Community Services Business Operations Manual, provides that the Marine Corps Exchange shall be the primary resale activity on Marine Corps installations for non-food merchandise and patron services. This Order reflects guidance and policy for the main retail stores including branch stores, convenience/Marine Marts, service stations including fuel, auto repair, and merchandise, catalog sales, grocery stores, when specifically authorized, commercial military clothing and military clothing sales stores (MCSS), packaged alcoholic beverage stores, retail concessionaires (i. e. GNC), and tactical field exchanges.

E.O. 9397 (SSN), Numbering System for Federal Accounts Relating to Individual Persons, as amended. It is the policy of the United States that the Federal Government move towards the use of a single, unduplicated numerical identification system of accounts and avoid the unnecessary establishment of additional systems. In addition, it establishes that the Federal agencies should conduct agency activities that involve personal identifiers in a manner consistent with protection of such identifiers against unlawful use.

2. Use of the Information

Respondents are individuals who patronize MCCS retail activities when they are aboard the USMC installations. The collection instruments include the retail point-of-sale system terminal located at each MCCS retail activity, which is accessed by MCCS personnel. The respondents complete the collection by verbally providing requested data to the cashier based on transaction type requirement to include special orders, rain checks, send sales, returns/exchanges, check cashing, check tendering, and recruit tenders.

The information provided for the MCCS retail system's businesses and services is stored in an encrypted NAF RPOS database. All information collected by the NAF RPOS system is for managing and administering MCCS retail sales transactions and services provided. There are no invitations or other communications sent to the respondents associated with the information collected via the NAF RPOS. A complete collection instrument is handled and processed by limited person(s) responsible for servicing the record(s) in performance of their official duties and are properly screened and cleared for need-to-know. The intended results are to manage sales in an effective and efficient manner, identify high quality products and services that fulfill the customers' needs, improve customer experience, utilize sales data to improve business and marketing strategies, and increase the frequency of patronage of MCCS retail activity sales and services.

3. Use of Information Technology

Currently, all responses are provided verbally to MCCS personnel who manually key the information into the information system. The Marine Corps Exchange does not have an online ordering process (in-store only purchasing). The information collections such as special orders, will not be electronic submissions for individuals to complete themselves, the information collections are done at the point of sale terminal by an MCCS employee. Therefore there is 0% use of information technology.

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

Frequency of customer retail systems requests are based on the transaction type and at the discretion of the customer. If the frequency is less than proposed, at the customers' discretion, the customer would not be able to receive services in the time frame and manner requested.

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 for the collection published on Wednesday, September 25, 2019. The 60-Day FRN citation is 84 FRN 50441.

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

A 30-Day Federal Register Notice for the collection published on Wednesday, December 11, 2019. The 30-Day FRN citation is 84 FRN 67735.

Part B: CONSULTATION

No additional consultation apart from soliciting public comments through the 60-Day Federal Register Notice 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 displayed at the point-of-sale terminals where the information collection is obtained.

A System of Record Notice (SORN), NM04060-1, Navy and Marine Corps Exchange Sales Control and Security Files, may be accessed at <https://dpcl.d.defense.gov/Privacy/SORNsIndex/DOD-wide-SORN-Article-View/Article/570434/nm04060-1/>.

A Privacy Impact Assessment (PIA) for NAF Retail Point of Sale System (RPOS) may be accessed at <http://www.doncio.navy.mil/exports.aspx?id=12333>. The NAF RPOS PIA expiration date is 08.14.2021.

Records Retention and Disposition Schedule. Records are retained for six years and then destroyed.

11. Sensitive Questions

The RPOS system is capturing the Social Security Number (SSN) when patrons are paying by check tender, and they do not have a DoD ID number to provide, to identify if they are on the MCCS bad debt list or Army and Air Force Exchange Service's bad check list. The last four of the SSN is also being captured for transactions that require the recruit to pay on an account. An SSN Justification memo has been submitted with this ICR package.

12. Respondent Burden and its Labor Costs

a. Estimation of Respondent Burden

1.

Labor Cost of Respondent Burden					
Information Collection	Number of Respondents	Number of Responses Per Respondent	Number of Total Annual Responses	Response Time (minutes)	Respondent Burden Hours
Special Orders	837	2	1,674	10	279
Rain Checks	381	1	381	1	6.35
Send Sales	404	1	404	1	6.74
Return/Exchanges	203,971	1	203,971	2	6,799.04
Check Cashing	4,288	1	4,288	1	71.47
Check Tendering	14,497	1	14,497	1	241.62
Recruit Tenders	70,575	2	141,150	2	4,705
Total	294,953		366,365		12,109.22

2. Total Submission Burden

- a. Total Number of Respondents: 294,953
- b. Total Number of Annual Responses: 366,365
- c. Total Respondent Burden Hours: 12,109.22 hours

b. Labor Cost of Respondent Burden

1.

Labor Cost of Respondent Burden					
Information Collection	Number of Total Annual Responses	Minutes to Complete Response	Estimated Hourly Wage	Labor Burden per Response	Total Labor Burden

Special Orders	1,674	10	\$10.95	\$1.83	\$3,055.05
Rain Checks	381	1	\$10.95	\$0.18	\$69.53
Send Sales	404	1	\$10.95	\$0.18	\$73.73
Return/Exchanges	203,971	2	\$10.95	\$0.37	\$74,449.42
Check Cashing	4,288	1	\$10.95	\$0.18	\$782.56
Check Tendering	14,497	1	\$10.95	\$0.18	\$2,645.70
Recruit Tenders	141,150	2	\$10.95	\$0.37	\$51,519.75
Total	366,365		\$10.95		\$132,595.74

2. Overall Labor Burden

- a. Total Number of Annual Responses: 366,365
- b. Total Labor Burden: \$132,596.74

Hourly wage was based on Department of Labor hourly wages for “Cashiers” accessed on November 6, 2018 at <https://www.bls.gov/cps/cpsaat39.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

Labor Cost to the Federal Government					
NAF RPOS	Number of Total Annual Responses	Processing Time Per Response (minutes)	Estimated Hourly Wage	Cost to Process Each Response	Total Cost to Process Responses
Special Orders	1,674	10	\$11.69	\$1.95	\$3,261.51
Rain Checks	381	1	\$11.69	\$0.19	\$74.23
Send Sales	404	1	\$11.69	\$0.19	\$78.71
Return/Exchanges	203,971	2	\$11.69	\$0.39	\$79,480.70
Check Cashing	4,288	1	\$11.69	\$0.19	\$835.45
Check Tendering	14,497	1	\$11.69	\$0.19	\$2,824.50
Recruit Tenders	141,150	2	\$11.69	\$0.39	\$55,001.45
Total	366,365		\$11.69		\$141,556.55

2. Overall Labor Burden to Federal Government

- a. Total Number of Annual Responses: 366,365

b. Total Labor Burden: \$141,556.55

Labor costs for NF Level 2 employees is based on the average of minimum pay between East Coast and West Coast installations. Pay schedules referenced can be accessed at <https://www.cpms.osd.mil/Content/NAF%20Schedules/survey-sch/126/126-032-59-NF.html> and <https://www.cpms.osd.mil/Content/NAF%20Schedules/survey-sch/054/054-037-64-NF.html>.

b. Operational and Maintenance Costs

Reflects total annual costs using nonappropriated funds.

- a. Equipment: \$288,322
- b. Printing: \$0.00
- c. Postage: \$0.00
- d. Software Purchases: \$0.00
- e. Licensing Costs: \$766,569
- f. Other: Pin Pad Repairs: \$30,000
- g. Total: \$1,084,891

- 1. Total Operational and Maintenance Costs: \$1,084,891
- 2. Total Labor Cost to the Federal Government: \$141,556.55
- 3. Total Cost to the Federal Government: \$1,226,447.55

15. Reasons for Change in Burden

This is an existing collection currently in use without an OMB Control Number.

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.