

SUPPORTING STATEMENT - PART A

REQUEST FOR VERIFICATION OF BIRTH – OMB No. 0704-0006

Summary of Changes from Previously Approved Collection

- Burden has increased from 140,000 to 150,000 respondents

1. Need for the Information Collection

The information collection requirement is necessary to meet title 10, USC 505, 532, 3253, and 8253 requirements that an applicant meet minimum and maximum age and citizenship requirements for enlistment into the Armed Forces (including the Coast Guard). If an applicant is unable to provide a birth certificate, the recruiter will forward a DD Form 372, "Request for Verification of Birth," to a state or local agency requesting verification of the applicant's birth information. This verification of the birth date ensures that the applicant does not fall outside the age limitations and the place of birth supports the citizenship status claimed by the applicant.

2. Use of the Information

The DD Form 372 is the method of collecting and verifying birth information on applicants who are unable to provide a birth certificate from their city, county, or state. The DD Form 372 is sent to State and local agencies and is considered the official request for obtaining the birth information on applicants. The form can be downloaded from the Department of Defense publications website and completed electronically or it can be printed and completed manually. The form is then either emailed to the service recruiter or hard copy delivered by the individual applying for military service. Once the recruiter receives the completed form, it is scanned and uploaded into the service recruiting system to confirm date of birth and age as reported by the individual. This results in the verification that the applicant meets age standards and citizenship requirements for enlistment into the Armed Forces.

3. Use of Information Technology

90% of responses are emailed and completed electronically and returned to the recruiter electronically as an attachment to an email and then uploaded electronically into recruiting service systems as source documentation. The remaining 10% are completed manually due to local city, county, or state offices unable to process requests 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

Collection is completed on occasion for a select number of individuals that cannot provide a valid birth certificate to military service recruiters. Without this collection recruiters would not be able to validate that a applicants meets age and citizenship requirements for enlistment into the Armed Forces.

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, October 10th, 2019. The 60-Day FRN citation is 84 FR 54598, pages 54598-54599.

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

A 30-Day Federal Register Notice for the collection published on Monday, January 17, 2020. The 30-Day FRN citation is 85 FRN 3041.

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.

Completed forms are covered by recruiting and official military personnel SORNS maintained by each of the Services. Applicable SORNs:

- Army- <http://dpcl.d.defense.gov/Privacy/SORNsIndex/DOD-wide-SORN-Article-View/Article/570071/a0601-210a-usarec/>
- Navy- <http://dpcl.d.defense.gov/Privacy/SORNsIndex/DOD-wide-SORN-Article-View/Article/570318/n01133-2/> and <http://dpcl.d.defense.gov/Privacy/SORNsIndex/DOD-wide-SORN-Article-View/Article/570628/m01133-3/>
- Air Force- <http://dpcl.d.defense.gov/Privacy/SORNsIndex/DOD-wide-SORN-Article-View/Article/569780/f036-aetc-r/>

The PIA for the service recruiting services are provided at the following links:

- Army- <http://ciog6.army.mil/Portals/1/PrivacyImpactAssessments/2015/ARISS.pdf>
- Navy- http://www.doncio.navy.mil/uploads/Summary_BUPERS_PRIDE%20MOD_PIA_03-22-2017.pdf
- Air Force- <http://www.privacy.af.mil/Portals/26/documents/AFD-110324-121.pdf>

The records will be retain in accordance with each recruiting and official military personnel SORNS

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 372 Request for Verification of Birth]
 - a) Number of Respondents: 150,000
 - b) Number of Responses Per Respondent: 1
 - c) Number of Total Annual Responses: 150,000
 - d) Response Time: 0.083 hour (5 minutes)
 - e) Respondent Burden Hours: 12,450 hours

Part B: LABOR COST OF RESPONDENT BURDEN

- 1) Collection Instrument(s)
[DD Form 372 Request for Verification of Birth]
 - a) Number of Total Annual Responses: 150,000
 - b) Response Time: 0.083 hour (5 minutes)

- c) Respondent Hourly Wage: \$7.25
- d) Labor Burden per Response: $\$7.25 \times 0.083 \text{ hour (5 minutes)} = \0.60
- e) Total Labor Burden: \$90,000

2) Overall Labor Burden

- a) Total Number of Annual Responses: 150,000
- b) Total Labor Burden: \$90,263

The Respondent hourly wage was determined by using the Department of Labor Wage Website (<http://www.dol.gov/dol/topic/wages/index.htm>) for the Federal Minimum Wage for 2019.

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 372 Request for Verification of Birth]

- a) Number of Total Annual Responses: 150,000
- b) Processing Time per Response: 0.25 (15 minutes) hours
- c) Hourly Wage of Worker(s) Processing Responses : \$25.00
- d) Cost to Process Each Response: \$6.25
- e) Total Cost to Process Responses: \$937,500

Hourly wage of workers is drawn upon E-6 base pay of \$4,046.70 per month

Part B: OPERATIONAL AND MAINTENANCE COSTS

1) Cost Categories

- a) Equipment: \$0
- b) Printing: \$0
- c) Postage: 15,000 mailings at $\$0.50 \times 2 \text{ mailings} = \$7,500$
- d) Software Purchases: \$0
- e) Licensing Costs: \$0
- f) Other: \$0

2) Total Operational and Maintenance Cost: \$7,500

Part C: TOTAL COST TO THE FEDERAL GOVERNMENT

- 1) Total Labor Cost to the Federal Government: \$937,500

2) Total Operational and Maintenance Costs: \$7,500

3) Total Cost to the Federal Government: \$945,000

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.