

## SUPPORTING STATEMENT - PART A

REQUEST FOR REFERENCE – OMB No. 0704-0167

### Summary of Changes from Previously Approved Collection

- Minor revisions to DD Form 370 which slightly increased the burden
- Added instructions to the form

#### 1. Need for the Information Collection

Title 10 United States Code (USC), Sections 504 (Persons not Qualified), 505 (Regular Components: qualifications), 508 (Reenlistment: qualifications) and 12102 (Reserve Components: qualifications) establish minimum standards for enlistment in the Armed Forces. This information collection is needed to obtain additional information on individuals applying for enlistment in the Armed Services who require a waiver to enlist. Information requested is necessary to determine eligibility for enlistment and identify individuals with potential detrimental characteristics. Additionally, this collection is supportive of certain youth employment programs, as it is also needed for certain categories of disadvantaged youth who would not normally be eligible to enlist. Therefore, verification data from the reference must be obtained before an enlistment waiver can be granted.

#### 2. Use of the Information

The information collection begins with a recruiter identifying the need for references based on an applicant's disclosure of their history. The recruiter will complete section I of the form and then provide either a hard copy or digital copy, when possible, to the respondent. The respondent will complete the identified sections and return the form to the recruiter for inclusion into their application file.

The respondents to this data collection are individuals that the applicant has identified as a reference to a military service. The purpose of this information collection is to verify the data given by the applicant, determine his/her qualification for enlistment, and to request a waiver, if applicable. DD Form 370 includes comments on character and past behavior and serves as a pre-accession tool for Military Service Recruiters to screen applicants.

The form is initiated by the recruiter for applicants requiring a waiver for civil or moral offense(s). The 2019 Revision of the DD 370 has language to state who completes which sections of the form: Section I is completed by the Recruiting Representative. Section III is completed by the respondent or person the applicant identified as a reference. The determination of the need of an enlistment waiver may be based upon information presented by the applicant, found on the applicant's file, or when applicants, in the judgment of a recruiter, may be withholding information.

Respondents are individuals familiar with the applicant's character. Respondents can include individuals who are related to, or have knowledge of, the applicant's background; state or local agencies; employers; and businesses that can provide a personal evaluation of the applicant's potential to adapt successfully to military service. Respondents are provided a hard copy of the form; however, whenever possible the respondent may be provided a digital copy of the form via email. The respondent is not sent any additional information or invitation besides the form. Completion of the DD Form 370 is voluntary. The information obtained is maintained in compliance with the Privacy Act of 1974.

Since the institution of this form, the information collected has been used by DoD to verify enlistment eligibility/acceptability for military enlistment and to gather statistical information about the population composition of our Armed Forces.

### 3. Use of Information Technology

Access to the electronically generated DD Form 370 is available on the DoD World Wide Web at Defense Link/Publications site. Recruiting stations with the capability to electronically produce the form and enter the data will do so. It is reported that 90% of responses are collected electronically.

The entire accession enterprise is currently in the process of modernizing their IT systems in order to achieve a paperless-all digital accession process, but this will not be fully implemented for another few years.

### 4. Non-duplication

The information obtained through this collection is unique and is not already available for use or adaptation from another cleared source. DD Form 370 is the only request for reference for applicants requiring a waiver.

### 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

The form is only initiated by the recruiter for applicants requiring a waiver for civil or moral offense(s). Not using this form would result in the Military Services not being able to make an informed determination of the ability of the applicant to serve.

### 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 10<sup>th</sup>, 2019. The 60-Day FRN citation is 84 FR 54597, pages 54597-54598.

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

A 30-Day Federal Register Notice for the collection published on Friday January 17, 2020. The 30-Day FRN citation is 85 FRN 3038.

### 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.

While there is no PII collected on the individual the response is protected as confidential and handled as if it was PII in the recruiting service information systems covered under the following SORNS:

- Army- <http://dpclد.defense.gov/Privacy/SORNSIndex/DOD-wide-SORN-Article-View/Article/570071/a0601-210a-usarec/>
- Navy- <http://dpclد.defense.gov/Privacy/SORNSIndex/DOD-wide-SORN-Article-View/Article/570318/n01133-2/> and <http://dpclد.defense.gov/Privacy/SORNSIndex/DOD-wide-SORN-Article-View/Article/570628/m01133-3/>
- Air Force- <http://dpclد.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](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>

Records will retained for two years and then destroyed.

#### 11. Sensitive Questions

No questions considered sensitive are being asked in this collection.

However, Questions 15-18 ask the respondent to rate the applicant's character and provide information about the applicant's use of alcohol or drugs. These questions help recruiters discern whether the applicant is eligible for military service. These questions also help recruiters identify individuals with potential disqualifiers for military enlistment. Without these questions, the military services could potentially enlist individuals with propensities to immoral behaviors, which often results in disciplinary actions and early attrition.

#### 12. Respondent Burden and its Labor Costs

##### Part A: ESTIMATION OF RESPONDENT BURDEN

- 1) Collection Instrument(s)  
[DD Form 370 Request for Reference(s)]
  - a) Number of Respondents: 50,000
  - b) Number of Responses Per Respondent: 1
  - c) Number of Total Annual Responses: 50,000
  - d) Response Time: 0.17 hour (10 minutes)
  - e) Respondent Burden Hours: 8,500 hours
  
- 2) Total Submission Burden
  - a) Total Number of Respondents: 50,000
  - b) Total Number of Annual Responses: 50,000
  - c) Total Respondent Burden Hours: 8,500 hours

##### Part B: LABOR COST OF RESPONDENT BURDEN

- 1) Collection Instrument(s)  
[DD Form 370 Request for Reference(s)]
  - a) Number of Total Annual Responses: 50,000
  - b) Response Time: 0.17 (10 minutes)
  - c) Respondent Hourly Wage: \$7.25
  - d) Labor Burden per Response:  $\$7.25 \times 0.17$  (10 minutes) = \$1.23 PER FORM
  - e) Total Labor Burden: \$61,625
  
- 2) Overall Labor Burden

- a) Total Number of Annual Responses: 50,000
- b) 61,625

The Respondent hourly minimum wage, taken from the federal minimum 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 Instruments

[DD Form 370 Request for Reference (s)]

- a) Number of Total Annual Responses: 50,000
- 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: \$312,500

2) Overall Labor Burden to the Federal Government

- a) Total Number of Annual Responses: 50,000
- b) Total Labor Burden: \$312,500

Labor cost to the federal government is based upon an 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: 5,000 mailings at \$0.50 X 2 mailings = \$5,000
- d) Software Purchases: \$0
- e) Licensing Costs: \$0
- f) Other: \$0

2) Total Operational and Maintenance Cost: \$5,000

Part C: TOTAL COST TO THE FEDERAL GOVERNMENT

- 1) Total Labor Cost to the Federal Government: \$312,500

2) Total Operational and Maintenance Costs: \$5,000

3) Total Cost to the Federal Government: \$317,500

15. Reasons for Change in Burden

This is a reinstatement with change to an expired collection.

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.