

SUPPORTING STATEMENT - PART A

Nonappropriated Fund Human Resource Management System (NAF HRMS) – 0703-0071

Summary of Changes from Previously Approved Collection

- Revisions to instruments include adding a proposed form for benefits management, “Marine Corps NAF Group Insurance and Retirement Agreement.”
- The number of responses and time burden have decreased slightly due to a reduction in applicants caused by the COVID-19 pandemic.
- Overall cost burden to the public has increased slightly due to a normal increase in hourly wages and the additional burden associated with the new form.

1. Need for the Information Collection

The information collections are necessary for Marine Corps Community Services (MCCS) to successfully manage and administer effective and efficient recruiting, hiring, and retiree benefits processes. MCCS’s use of innovative technologies in the Nonappropriated Fund Human Resource Management System (NAF HRMS) enables MCCS to streamline the employment application process, reduce processing and recruiter response times, and decrease the need for applicant calls and inquiries. The benefits management process provides flexibility in the manner retirees may submit change requests. As a result, the respondents’ experiences at various stages in the employment life cycle are improved.

Authorities to collect the information:

5 U.S.C. Chapter 71, Labor Management Relations. Provides general provisions for labor management relations; rights and duties of agencies and labor organizations; grievances, appeals, and review; and administrative and other provisions.

DoDD 1400.25, DoD Civilian Personnel Management System. Requires the office of the Under Secretary of Defense for Personnel and Readiness to promulgate DoD Publications to implement DoD policy and civilian personnel management and for the Heads of DoD Components to implement the DoD civilian personnel policies, procedures, programs, and requirements.

SECNAVINST 12250.6B, Civilian Human Resources Management in the Department of the Navy. Establishes general policies for civilian HR and EEO programs supporting the DON civilian workforce. Establishes the responsibility to develop and maintain required reports and metrics.

MCO P12000.11A, as amended, Marine Corps NAF Personnel Policy Manual. Provides policy for maintenance of employee records and files in compliance with 29 U.S.C. 211; policy for maintenance of official personnel long term and short term files: application for employment, personnel and payroll actions, certificate of completion of investigation or

clearance, position description, health and group life insurance selection and participation records, retirement plan and 401(k) plan coverages selection and participation records, performance appraisals, record of training and other certificates, formal disciplinary actions, personnel action requests, employee's withholding allowance certificate, certified copies of completed military orders, check-out/exit interview sheets, official records, and retirement records. In addition, provides that activities must maintain records of each volunteer's scope of duties, volunteer hours, and training provided.

2. Use of the Information

There are two key groups of respondents. The primary and first group of respondents are applicants seeking employment with MCCS. MCCS advertises positions via various mechanisms (such as websites, social media, television, newspapers, flyers, billboards, job fairs, employee and email referrals, and a variety of recruiters and recruitment methods), all which direct the applicant to the MCCS Civilian Careers website for information about the organization, benefits, available positions, and opportunities. The applicant goes to the MCCS Civilian Careers website accessible at <https://careers.usmc-mccs.org> and clicks on "Prospective Employees." The website provides detailed instructions on the application process and provides up to date job postings with MCCS career opportunities that the applicant can review. The applicant can then select and apply to the job posting of their choice.

The applicant registers to create a user ID, password, and profile and then completes the application process. The application includes a systematic process to assist the applicant in completing the application and submitting it through the NAF HRMS via the MCCS Civilian Careers website. The applicant may choose to attach additional documentation; however, it is not required.

Once the application is submitted and the position closes, the recruiter and personnel with an official need-to-know will then manage the recruitment process in coordination with the respective managers for rating/ranking, interviews, selection, and hiring, as applicable. Once selections are made, the posting is completed and closed. All application packages will be maintained in the NAF HRMS in accordance with the approved disposition. The end result is successful management and administration of MCCS's recruitment and hiring process.

The second and smaller group of respondents are MCCS retirees receiving an annuity who are voluntarily requesting to make a change to their current NAF group medical, dental, or life insurance plans; their NAF group retirement plan; and/or their beneficiary information. Respondents are notified via direct mailings, social media, and the website regarding open enrollment and change periods. Information pertaining to managing employee benefits, including contact information, may be accessed at <https://www.usmc-mccs.org/employ/benefits/>. The respondent contacts the Headquarters Benefits team via phone or email to request the Marine Corps NAF Group Insurance and Retirement Agreement form, which is emailed/mailed to the retiree, dependent on their request. The retiree then completes the form and emails/mailed the

form to Headquarters Benefits. The changed information is then entered into the NAF HRMS system by the Headquarters Benefits Specialist who provides direct support to retirees. The end result is the successful management and administration of MCCS retiree benefits.

3. Use of Information Technology

Submissions for applicants are 100% electronic, and captured in the NAF HRMS. Submissions for retirees are done by completing the Marine Corps NAF Group Insurance and Retirement Agreement form. Twenty percent of retiree benefit(s) change requests are submitted via email and the remaining eighty percent are submitted via mail, which is then captured in the NAF HRMS. Currently, the NAF HRMS delivered pension module does not provide self-service access capabilities for retirees to make online updates via the system. The employee benefits and NAF HRMS applications teams are evaluating the feasibility of customization options for enhancements and business process changes to enable retirees' access to the NAF HRMS for these enrollment updates in the future.

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

On occasion based on applicants' and retirees' discretion. If applicants were not permitted to provide their personal information on occasion for employment applications the negative impacts could include a decreased amount of qualified applicants for MCCS employment opportunities. If retirees were not permitted to provide their personal information as needed to make changes to their Marine Corps NAF group insurance and retirement plans, their insurance coverage may be delayed or outdated.

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, February 23, 2022. The 60-Day FRN citation is 87 FR 10182.

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

A 30-Day Federal Register Notice for the collection published on Monday, April 25, 2022. The 30-Day FRN citation is 87 FR 24289.

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 displayed on the initial page of the employment application, prior to input of personal information, and the applicant must agree to proceed with the application process.

A Privacy Act Statement is included on the Marine Corps NAF Group Insurance and Retirement Agreement form.

The previously proposed SORN M12293-2, "Marine Corps Community Services Human Resource Management System (MCCS HRMS)," was not published due to the DoD SORN consolidation initiative. Until such time as a DoD-wide Human Resource SORN is updated to simplify access procedures, MCCS HRMS must be reliant on multiple SORNs to achieve compliance. Applicable NAF HRMS SORNs include the following:

- A0215-1a FMWRC DoD, Department of Defense Non-appropriated Fund Health Benefits FMWRC (DoDNHB). (July 28, 2011, 76 FR 45234)
(<https://dpcl.d.defense.gov/Privacy/SORNsIndex/DOD-wide-SORN-Article-View/Article/570006/a0215-1a-fmwrc-dod/>)
- OPM/GOVT-1, General Personnel Records (December 11, 2012, 77 FR 79694)
(<https://dpcl.d.defense.gov/Privacy/SORNsIndex/DOD-wide-SORN-Article-View/Article/570733/opmgovt-1/>)
- N12293-1, Human Resources Civilian Portfolio (May 02, 2012, 77 FR 25993)
(<https://dpcl.d.defense.gov/Privacy/SORNsIndex/DOD-wide-SORN-Article-View/Article/570405/n12293-1/>)
- NM07010-1, DON Non-Appropriated Funds Standard Payroll System (June 16, 2014, 79 FR 34305)

(<https://dpcl.d.defense.gov/Privacy/SORNsIndex/DOD-wide-SORN-Article-View/Article/570452/nm07010-1/>)

- NM07421-1, Time and Attendance Feeder Records (August 15, 2007, 72 FR 45798) (<https://dpcl.d.defense.gov/Privacy/SORNsIndex/DOD-wide-SORN-Article-View/Article/570455/nm07421-1/>)
- NM01754-3, DON Child and Youth Program (May 27, 2010, 75 FR 29728) (<https://dpcl.d.defense.gov/Privacy/SORNsIndex/DOD-wide-SORN-Article-View/Article/570428/nm01754-3/>)

The published PIA, NAF Human Resource Management System (NAF HRMS) with expiration date of June 28, 2024, may be accessed at <https://www.doncio.navy.mil/ContentView.aspx?id=678>.

Job vacancy case files are destroyed 2 years after selection certificate is closed or final settlement of any associated litigation; whichever is later (GRS 2.1).

Marine Corps NAF Group Insurance and Retirement Agreement forms are destroyed when 3 years old, but longer retention is authorized if required for business use (DON Records Schedule 12000-18).

NAF HRMS is the official repository of MCCS personnel records, comprised of 18 modules that are fully integrated, and is assigned DON Records Schedule 12000-49, with the following disposition: Destroy when 56 years old.

11. Sensitive Questions

Voluntary disclosure for race and/or ethnicity is used for purposes of reporting to the Equal Employment Opportunity Commission on diversity in hiring practices for statistical purposes only. This information is not used in the determination of selection and hiring.

The Social Security Number Justification Memorandum is current and a copy is submitted with this package. The SSN is the primary unique identifier for individuals. The SSN is required for verification of security clearances, integrations with other DoD systems that require SSNs (including but not limited to Defense Manpower Data Center (DMDC) for Common Access Card (CAC) processing), confirmation of employment eligibility, administration of workers' compensation and validation, and benefits processing including the Affordable Care Act. Additionally, Federal and State Income Tax Programs rely on the use of SSNs for W2 and Tax Reporting purposes for payroll. SSNs are also required for interactions with financial institutions and benefits institutions that administer the Marine Corps NAF employee benefits program including health benefits, Flexible Spending Accounts (FSA), life insurance, savings, and retirement plans.

12. Respondent Burden and its Labor Costs

Part A: ESTIMATION OF RESPONDENT BURDEN

1) Collection Instruments

Online Application

- a) Number of Respondents: 69,953
- b) Number of Responses Per Respondent: 1
- c) Number of Total Annual Responses: 69,953
- d) Response Time: 30 minutes
- e) Respondent Burden Hours: 34,976.5 hours

Marine Corps NAF Group Insurance and Retirement Agreement Form

- a) Number of Respondents: 50
- b) Number of Responses Per Respondent: 1
- c) Number of Total Annual Responses: 50
- d) Response Time: 15 minutes
- e) Respondent Burden Hours: 12.5 hours

2) Total Submission Burden

- a) Total Number of Respondents: 70,003
- b) Total Number of Annual Responses: 70,003
- c) Total Respondent Burden Hours: 34,989 hours

Part B: LABOR COST OF RESPONDENT BURDEN

1) Collection Instruments for NAF HRMS

Online Application

- a) Number of Total Annual Responses: 69,953
- b) Response Time: 30 minutes
- c) Respondent Hourly Wage: \$20.22
- d) Labor Burden per Response: \$10.11
- e) Total Labor Burden: \$707,224.83

Marine Corps NAF Group Insurance and Retirement Agreement Form

- a) Number of Total Annual Responses: 50
- b) Response Time: 15 minutes
- c) Respondent Hourly Wage: \$20.22
- d) Labor Burden per Response: \$5.06
- e) Total Labor Burden: \$252.75

2) Overall Labor Burden

- a) Total Number of Annual Responses: 70,003
- b) Total Labor Burden: \$707,478

The respondent hourly wage was determined by using the Department of Labor Wage Website (<https://www.bls.gov/cps/cpsaat39.htm> for “sales and office occupations,” retrieved 10/13/2021).

13. Respondent Costs Other Than Burden Hour Costs

Retirees who choose to mail the Marine Corps NAF Group Insurance and Retirement Agreement form have costs apart from the burden associated with completing this collection.

- 1) Marine Corps NAF Group Insurance and Retirement Agreement Form
 - a) Number of Total Annual Responses submitted via U.S. Postal Service: 40
 - b) Postage: \$0.58
 - c) Envelope: \$0.10
 - d) Cost Apart from Burden per Response: \$0.68
- 2) Total Costs Apart from Burden: \$27.20

14. Cost to the Federal Government

Part A: LABOR COST TO THE FEDERAL GOVERNMENT

- 1) Collection Instrument
 - Online Application
 - a) Number of Total Annual Responses: 69,953
 - b) Processing Time per Response: 7.5 minutes
 - c) Hourly Wage of Worker(s) Processing Responses: \$25.75
 - d) Cost to Process Each Response: \$3.22
 - e) Total Cost to Process Responses: \$225,161.22

Marine Corps NAF Group Insurance and Retirement Agreement Form

- a) Number of Total Annual Responses: 50
 - b) Processing Time per Response: 10 minutes
 - c) Hourly Wage of Worker(s) Processing Responses: \$34.98
 - d) Cost to Process Each Response: \$5.83
 - e) Total Cost to Process Responses: \$291.50
- 2) Overall Labor Burden to the Federal Government
 - a) Total Number of Annual Responses: 70,003
 - b) Total Labor Burden: \$225,452.72

Labor costs for NF Level 3 employees: median wage is \$25.75 per hour.

Labor costs for NF Level 4 employees: median wage is \$34.98 per hour.

Wage schedules may be accessed at: <https://wageandsalary.dcpas.osd.mil/Content/NAF%20Schedules/survey-sch/054/054-044-71-NF.pdf>.

Part B: OPERATIONAL AND MAINTENANCE COSTS

- 1) Cost Categories
 - a) Equipment: \$2,450
 - b) Printing: \$1,760
 - c) Postage: \$19.00
 - d) Software Purchases: \$0
 - e) Licensing Costs: \$23,000
 - f) Other - Envelopes: \$4.00

2) Total Operational and Maintenance Cost: \$27,233

Part C: TOTAL COST TO THE FEDERAL GOVERNMENT

- 1) Total Labor Cost to the Federal Government: \$225,452.72
- 2) Total Operational and Maintenance Costs: \$27,233
- 3) Total Cost to the Federal Government: \$252,686

15. Reasons for Change in Burden

The estimated number of responses and time burden have decreased slightly since the previous approval due to a reduction in applicants caused by the COVID-19 pandemic. However, due to an increase in hourly wages and adding the burdens associated with the proposed form for benefits management, the overall cost burden to the public has increased slightly.

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.