

## SUPPORTING STATEMENT - PART A

Application for Establishment or Amendment of a JROTC or NDCC Unit- 0702-0021

### Summary of Changes from Previously Approved Collection

- Applications for establishment of a JROTC and NDCC unit are being reinstated under one OMB Control Number (0702-0021) instead of two (0702-0021 and 0702-0110)
- Addition of DA Form 918B “Amendment to Application and Agreement for Establishment of Army Reserve Officers’ Training Corps Unit”
- Title of information collection request changed to reflect combined collections
- Increase in burden due to consolidation of OMB Control Numbers 0702-0021 and 0702-0110 and addition of DA Form 918B

### 1. Need for the Information Collection

The Junior Reserve Officers’ Training Corps (JROTC) and the National Defense Cadet Corps (NDCC) are citizenship programs designed to motivate young people to be better citizens. Title 10, United States Code, Section 2031 and 32 CFR 542 provide for the establishment of units by the Department of the Army at public and private secondary schools. Educational institutions that desire to host a JROTC or NDCC unit may apply using DA Form 3126, “Application and Contract for Establishment of a Junior Reserve Officers’ Training Corps Unit,” and 3126-1 “Application and Contract for Establishment of a National Defense Cadet Corps Unit,” respectively. The programs provide unique education opportunities for young citizens through their participation in a Federally sponsored curriculum while pursuing their civilian education. Students develop citizenship, leadership, communication skills, an understanding of the role of the U.S. army in support of national objectives, and an appreciation for the importance of physical fitness. The DA Form 918B, “Amendment to Application and Agreement for Establishment of Army Reserve Officers’ Training Corps Unit,” is used by hosting institutions to amend or cancel existing contracts for JROTC or NDCC programs, as well as Senior ROTC programs authorized under 10 U.S.C. 103. The forms are prescribed by Army Regulation (AR) 145-1, “Senior Reserve Officers’ Training Corps Program: Organization, Administration, and Training,” and AR 145-2, “Organization, Administration, Operation, and Support.”

### 2. Use of the Information

The DA Forms 3126 and 3126-1 are completed by an applicant public or private secondary school to apply for the establishment of a JROTC or NDCC Unit, respectively. The forms are completed and then mailed or emailed to U.S. Army Cadet Command. Once processed, they are approved/countersigned by a representative of the Secretary of the Army. The contract establishes the mutual agreement between the educational institution and the U.S. Government. The Commanding General, U.S. Army Human Resources Command is

responsible for administration and policy pertaining to the JROTC or NDCC programs. The Commanding General, U.S. Army Cadet Command manages and executes the program through Brigade Commanders who are responsible for the operation and training of units within their assigned areas. Data provided on DA Form 3126 and 3126-1 are used to determine which schools are invited to host a unit, to establish a fair and equitable distribution of units throughout the Nation, and to identify selection criteria such as enrollment potential, capacity of the institutions to conduct the program, educational accreditation, and the ability of the school to comply with statutory and contractual obligations.

The NDCC unit is an alternative to JROTC for schools that wish to expedite the opening of a program. The U.S. Army will supply curriculum material for the instructors, the students and Cadets. The U.S. Army will also supply forms and regulations which are required to successfully conduct the program. Schools hosting an NDCC unit must comply with statutory and regulatory guidance as regular JROTC units; specifically, units must employ a minimum of two instructors certified by Headquarters, U.S. Army Cadet Command. Schools hosting NDCC units may apply and be placed on the order of merit list for a JROTC Program. Starting an NDCC unit may expedite a school to get a JROTC Program slot.

DA Form 918B is used by any institution with an active JROTC, NDCC, or Senior ROTC unit to make amendments to their contracts. It is also completed, and then mailed or emailed to U.S. Army Cadet Command.

### 3. Use of Information Technology

All three forms are fillable pdfs that may be completed electronically or printed and filled out manually. About 30 percent of forms are emailed, while the other 70 percent are mailed. Since the number of respondents is relatively low, and the information requested is simple and readily available, improved information technology was not considered as it would likely result in a more complex and burdensome collection.

### 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

This collection is necessary to sustain the validity and liability of the information in our regulatory guidance. It will serve to sustain our ability to collect useable information from current units and educational institutions. If we collect the responses less frequently, we

will not be able to determine unit needs or to sustain required responses to the Program Objective Memorandum (POM) and higher headquarter reports.

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 Friday, February 11, 2022. The 60-Day FRN citation is 87 FRN 8002.

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

A 30-Day Federal Register Notice for the collection published on Friday, September 23, 2022. The 30-Day FRN citation is 87 FR 58074.

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 record number for these forms in 145-1b. Retention and disposition schedule: Even is after completion of subsequent camp. Keep in current file area (CFA) until event occurs and then until no longer needed for conducting business, then destroy the record 1 year after the event. Disposition authority is NN-166-205.

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)

[DA Form 3126]

- a) Number of Respondents: 70
- b) Number of Responses Per Respondent: 1
- c) Number of Total Annual Responses: 70
- d) Response Time: 1 hour
- e) Respondent Burden Hours: 70 hours

[DA Form 3126-1]

- a) Number of Respondents: 70
- b) Number of Responses Per Respondent: 1
- c) Number of Total Annual Responses: 70
- d) Response Time: 1 hour
- e) Respondent Burden Hours: 70 hours

[DA Form 918B]

- a) Number of Respondents: 18
- b) Number of Responses Per Respondent: 1
- c) Number of Total Annual Responses: 18
- d) Response Time: 30 minutes
- e) Respondent Burden Hours: 9 hours

2) Total Submission Burden

- a) Total Number of Respondents: 158
- b) Total Number of Annual Responses: 158
- c) Total Respondent Burden Hours: 149 hours

Part B: LABOR COST OF RESPONDENT BURDEN

1) Collection Instrument(s)

[DA Form 3126]

- a) Number of Total Annual Responses: 70
- b) Response Time: 1 hour
- c) Respondent Hourly Wage: \$47.35
- d) Labor Burden per Response: \$47.35
- e) Total Labor Burden: \$3,314.50

[DA Form 3126-1]

- a) Number of Total Annual Responses: 70
- b) Response Time: 1 hour
- c) Respondent Hourly Wage: \$47.35
- d) Labor Burden per Response: \$47.35
- e) Total Labor Burden: \$3,314.50

[DA Form 918B]

- a) Number of Total Annual Responses: 18
- b) Response Time: 30 minutes
- c) Respondent Hourly Wage: \$47.35
- d) Labor Burden per Response: \$23.68
- e) Total Labor Burden: \$426.15

2) Overall Labor Burden

- a) Total Number of Annual Responses: 158
- b) Total Labor Burden: \$7,056

The Respondent hourly wage was determined by using the Bureau of Labor Statistics Website <https://www.bls.gov/ooh/management/elementary-middle-and-high-school-principals.htm>

13. Respondent Costs Other Than Burden Hour Costs

Costs for respondents to mail in their forms are estimated to be about \$0.60 per response. 70 percent of responses, or about 110 annually, are sent via postal mail. This results in an estimated annual cost of \$66.00.

14. Cost to the Federal Government

Part A: LABOR COST TO THE FEDERAL GOVERNMENT

1) Collection Instrument(s)

[DA Form 3126]

- a) Number of Total Annual Responses: 70
- b) Processing Time per Response: 1 hour
- c) Hourly Wage of Worker(s) Processing Responses: \$39.70
- d) Cost to Process Each Response: \$39.70
- e) Total Cost to Process Responses: \$2,779.00

[DA Form 3126-1]

- a) Number of Total Annual Responses: 70
- b) Processing Time per Response: 1 hour
- c) Hourly Wage of Worker(s) Processing Responses: \$39.70
- d) Cost to Process Each Response: \$39.70
- e) Total Cost to Process Responses: \$2,779.00

[DA Form 918B]

- a) Number of Total Annual Responses: 18
  - b) Processing Time per Response: 1 hour
  - c) Hourly Wage of Worker(s) Processing Responses: \$39.70
  - d) Cost to Process Each Response: \$39.70
  - e) Total Cost to Process Responses: \$714.60
- 2) Overall Labor Burden to the Federal Government
- a) Total Number of Annual Responses: 158
  - b) Total Labor Burden: \$6,272.60

Part B: OPERATIONAL AND MAINTENANCE COSTS

- 1) Cost Categories
- a) Equipment: \$3,200.00
  - b) Printing: \$33.60
  - c) Postage: \$30.00
  - d) Software Purchases: \$0
  - e) Licensing Costs: \$0
  - f) Other: \$
- 2) Total Operational and Maintenance Cost: \$3,263.60

Part C: TOTAL COST TO THE FEDERAL GOVERNMENT

- 1) Total Labor Cost to the Federal Government: \$6,272.60
- 2) Total Operational and Maintenance Costs: \$3,263.60
- 3) Total Cost to the Federal Government: \$9,536

15. Reasons for Change in Burden

This is a reinstatement with change to an expired collection. The increase in burden is primarily a result of the addition of DA Forms 3126-1 and 918B so that they are in the same information collection request as DA Form 3126.

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.