

SUPPORTING STATEMENT - PART A

Education Verification for National Guard Enlistees – 0704-0584

1. Need for the Information Collection

This information collection is required for the National Guard Bureau to effectively manage training seat utilization for initial entry training Soldiers and applicants. The information collected contributes to validation of enrolled students who require delayed training paths. Collection is authorized by Title 10 U.S. Code Section 503 – Enlistments: recruiting campaigns; compilation of directory information.

2. Use of the Information

Army National Guard (ARNG) Recruiters who have begun processing an applicant who is currently enrolled as a High School Junior or Senior and has agreed to enter the Army National Guard will collect the projected graduation date, final day of school for current school year, and first day of school for the upcoming school year, if applicable, from the school Guidance Counselor. Parental consent to obtain information and transcript is required for an applicant considered a minor. This information is collected on NGB Form 901, “Army National Guard High School Verification.”

Army National Guard (ARNG) Recruiters who have begun processing an applicant who claims to be currently enrolled as a college student, and has agreed to enter the Army National Guard will need a training date scheduled at the conclusion of the current semester. In an effort to verify these applicants are enrolled and the actual date of the last day of the current semester, ARNG Recruiters will request information from a school official on the NGB Form 900, “Army National Guard College Enrollment Verification Form.”

Both forms may be printed and filled manually. Applicants may return the completed forms to the recruiter by mail (includes e-mail), hand-carry, or facsimile machines. The signed forms will then be uploaded into the Army Recruiting Information Support System (ARISS) by the processing Recruiter. The Military Entrance Processing Station ARNG Guidance Counselor must use the information to establish the mandatory release date for any applicant who is a high school junior, prior to being enlisted into the ARNG or, in the case of NGB Form 901, to determine the date in which the applicant will ship to Army Initial Entry Training. Once the forms have been completed, there are no additional invitations associated with the information collection. Successfully completing this information will allow applicants an opportunity to enlist in the Army National Guard.

3. Use of Information Technology

The NGB Form 900 and 901 are available on the National Guard Publications website and available for download. However, in most cases ARNG Recruiters will print the forms and provide them directly to applicants. Additionally, the signatures of non-CAC holders must be completed manually. NGB estimates that 75% of respondents will submit the information collection 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

This collection of information is only required of applicants who desire to join the ARNG and are currently listed as high school juniors or seniors. Thus, collection is conducted on occasion.

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, June 22, 2022. The 60-Day FRN citation is 87 FR 37320.

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

A 30-Day Federal Register Notice for the collection published on Monday, August 22, 2022. The 30-Day FRN citation is 87 FR 51391.

Part B: CONSULTATION

No additional consultation apart from soliciting public comments through the 60-Day Federal Register Noticed 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

The Privacy Act Statement is located at the bottom of both NGB Form 900 and NGB Form 901.

The System of Record Notice (A0601-210 AHRC, Eligibility Determination Files) is available at: <http://dpcl.d.defense.gov/Privacy/SORNsIndex/DOD-wide-SORN-Article-View/Article/570074/a0601-210-ahrc.aspx>

A Privacy Impact Assessment (PIA) is not required for this collection because PII is not being collected electronically.

Enlisted eligibility records are destroyed upon reenlistment of individual. Inquiry records and other related documents are maintained for 7 years then destroyed.

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)

 NGB Form 900 (College Enrollment Verification)

- a) Number of Respondents: 5,000
- b) Number of Responses Per Respondent: 1
- c) Number of Total Annual Responses: 5,000
- d) Response Time: 5 minutes
- e) Respondent Burden Hours: 416.67 hours

 NGB Form 901 (High School Verification)

- a) Number of Respondents: 5,000
- b) Number of Responses Per Respondent: 1
- c) Number of Total Annual Responses: 5,000
- d) Response Time: 5 minutes
- e) Respondent Burden Hours: 416.67 hours

2) Total Submission Burden

- a) Total Number of Respondents: 10,000
- b) Total Number of Annual Responses: 10,000
- c) Total Respondent Burden Hours: 833 hours

Part B: LABOR COST OF RESPONDENT BURDEN

1) Collection Instrument(s)

 NGB Form 900 (College Enrollment Verification)

- a) Number of Total Annual Responses: 5,000
- b) Response Time: 5 minutes
- c) Respondent Hourly Wage: \$7.25
- d) Labor Burden per Response: \$.60
- e) Total Labor Burden: \$3,020.83

 NGB Form 901 (High School Verification)

- a) Number of Total Annual Responses: 5,000
- b) Response Time: 5 minutes

- c) Respondent Hourly Wage: \$7.25
- d) Labor Burden per Response: \$.60
- e) Total Labor Burden: \$3,020.83

2) Overall Labor Burden

- a) Total Number of Annual Responses: 10,000
- b) Total Labor Burden: \$6,042

Due to diversity of respondent background, minimum wage of \$7.25 was used to estimate labor burden.

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)

NGB Form 900 (College Enrollment Verification)

- a) Number of Total Annual Responses: 5,000
- b) Processing Time per Response: .1 hours
- c) Hourly Wage of Worker(s) Processing Responses: \$14.50
- d) Cost to Process Each Response: \$1.45
- e) Total Cost to Process Responses: \$7,250

NGB Form 901 (High School Verification)

- a) Number of Total Annual Responses: 5,000
- b) Processing Time per Response: .1 hours
- c) Hourly Wage of Worker(s) Processing Responses: \$14.50
- d) Cost to Process Each Response: \$1.45
- e) Total Cost to Process Responses: \$7,250

2) Overall Labor Burden to the Federal Government

- a) Total Number of Annual Responses: 10,000
- b) Total Labor Burden: \$14,500

Part B: OPERATIONAL AND MAINTENANCE COSTS

1) Cost Categories

- a) Equipment: \$0
- b) Printing: \$500
- c) Postage: \$0
- d) Software Purchases: \$0
- e) Licensing Costs: \$0

f) Other: \$0

2) Total Operational and Maintenance Cost: \$500

Part C: TOTAL COST TO THE FEDERAL GOVERNMENT

1) Total Labor Cost to the Federal Government: \$14,500

2) Total Operational and Maintenance Costs: \$500

3) Total Cost to the Federal Government: \$15,000

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.