

SUPPORTING STATEMENT - PART A

Air Force ROTC Program and Scholarship Application – 0701-0105

Summary of Changes from Previously Approved Collection

- Updated Collection Method: AFROTC Form 20 is no longer used. All collection is now completed online via the AFROTC application website. The online application replaces the main AFROTC Form 20 paper application, plus approximately 12 other forms which were completed as part of the application, eligibility, and/or enrollment process. The online application also gives applicants the ability to upload specific paperwork which is needed.
- The estimated response time for this request has increased from 30 minutes to approximately 3 hours. The application process has not actually become more burdensome; the response time has increased because the online application contains both the AFROTC Form 20 and 12 previously separate forms as explained above.

1. Need for the Information Collection

In order to process applications for the Air Force ROTC Program and Scholarship Eligibility, information must be collected from applicants and verified for eligibility prior to acceptance in the program. Authority to collect the application information is documented in the following:

- 10 U.S.C. 2103, Eligibility for Membership
- 10 U.S.C. 2104, Advanced Training - Eligibility for
- 10 U.S.C. 2107, Financial Assistance Program for Specially Selected Members
- 10 U.S.C. 103, Senior Reserve Officers' Training Corps
- 10 U.S.C. 33 Original Appointments of Regular Officers in Grades Above Warrant Officer Grades
- Executive Order 9897, Amendments to Regulations Relating to Commissioned Officers and Employees of the Public Health Service
- Executive Order 9397, Numbering System for Federal Accounts Relating to Individual Persons
- Air Force Reserve Officers' Training Corps Instruction 36-2011, Air Force Reserve Officer Training Corps

2. Use of the Information

Air Force ROTC application data is collected from potential ROTC cadets (at the high school level) using an online application accessed via a web capable device at <https://www.afrotc.com/apply/>. The applicant completes an email verification process, enters contact information, and answers questions to confirm eligibility for the program. If the applicant is not eligible, a notification of ineligibility appears, and the application is closed. If the applicant is eligible, the remaining questions are presented for the applicant to complete the application. The applicant is notified via email regarding the receipt of a

started application and given reminders of any required information that has not been submitted. During the process, the applicant can also select to apply for the High School Scholarship Program within the application. Once the applicant submits all required information and the application is reviewed (AND DEEMED ELIGIBLE) by ROTC Headquarters personnel, a notification is sent to the applicant via email regarding eligibility for the High School Scholarship and the AFROTC Program.

Once the scholarship applicant becomes eligible, the applicant is then contacted by a local AFROTC Detachment to set up an interview. When the interview is completed, then the applicant is placed on the first available scholarship board. The applicant is updated via email as to the date the board is to be held and when they will receive the results.

3. Use of Information Technology

Data for the AFROTC Program and Scholarship application is collected 100% using an online application accessed on a PC or other web capable device. The Information Collection system is the Holm Center Web Intensive Gains System (WINGS).

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 occurs only once when an individual applies to join Air Force ROTC. AFROTC and scholarship applicants can only apply during their Junior or Senior year in High School. Applications are only processed one time per year; therefore, multiple applications by the same applicant is not allowed. Failure to collect would result in the inability to determine if applicants meet the eligibility requirements for the program or process their application. There are no technical or legal obstacles to reduce this burden.

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 Wednesday, December 6, 2023. The 60-Day FRN citation is volume number 88 FR 84808.

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

A 30-Day Federal Register Notice for the collection published on Tuesday, August 27, 2024. The 30-Day FRN citation is 89 FR 68602.

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

The collection instrument includes a Privacy Act Statement.

The associated System of Records Notice (FO36 AETC X - College Scholarship Program) can be accessed at the following link:

<https://dpcl.dod.mil/Privacy/SORNsIndex/DOD-wide-SORN-Article-View/Article/569783/f036-aetc-x/>

The information collection requires a Privacy Impact Assessment (PIA). The PIA is currently being revised. A draft copy of the PIA, Holm Center Web Intensive New Gains System (WINGS) Application, has been provided with this package for OMB's review.

Records Disposition Tables & Rules:

T 10 - 15 R 13.01; Cadet Evaluation or applications for AFROTC College Scholarship Program - Destroy after 1 year or when no longer needed, whichever is sooner.

T 10 - 15 R 18.00; AFROTC Scholarship Program -- Destroy 1 year after termination of board cycle.

Records are retained in office files until superseded, obsolete, no longer needed for reference, or on inactivation, then destroyed by tearing into pieces, shredding, pulping, macerating, or burning. Computer records are destroyed by erasing, deleting, and overwriting.

11. Sensitive Questions

Race, Ethnicity, Name, Address, and SSN numbers are collected. Race and Ethnicity are used to provide statistics as requested by DoD. Name, Address, and SSN are collected to verify identity. The SSN is also used for Security Clearance Investigation or Verification, Confirmation of Employment Eligibility, Computer Matching and Legacy System Interface for systems that required SSN as a unique identifier. An SSN Justification letter is attached.

The Holm Center/A6 recently learned of the updated Standards for Maintaining, Collecting, and Presenting Federal Data on Race and Ethnicity (SPD 15). We understand the importance of ensuring consistent and comparable race and ethnicity data across the federal government. The Holm Center/A6 plans to comply by updating multiple modules

in our databases to reflect the specific requirements as soon as possible, but not later than March 28, 2029.

12. Respondent Burden and its Labor Costs

Part A: ESTIMATION OF RESPONDENT BURDEN

- 1) Collection Instrument
AFROTC Program and Scholarship Application
 - a) Number of Respondents: 12,600
 - b) Number of Responses Per Respondent: 1
 - c) Number of Total Annual Responses: 12,600
 - d) Response Time: 3 hours
 - e) Respondent Burden Hours: 37,800 hours

- 2) Total Submission Burden
 - a) Total Number of Respondents: 12,600
 - b) Total Number of Annual Responses: 12,600
 - c) Total Respondent Burden Hours: 37,800 hours

Part B: LABOR COST OF RESPONDENT BURDEN

- 1) Collection Instrument
AFROTC Program and Scholarship Application
 - a) Number of Total Annual Responses: 12,600
 - b) Response Time: 3 hours
 - c) Respondent Hourly Wage: \$7.25
 - d) Labor Burden per Response: \$21.75
 - e) Total Labor Burden: \$274,050

- 2) Overall Labor Burden
 - a) Total Number of Annual Responses: 12,600
 - b) Total Labor Burden: \$274,050

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
AFROTC Program and Scholarship Application
 - a) Number of Total Annual Responses: 12,600
 - b) Processing Time per Response: 1.5 hours

- c) Hourly Wage of Worker(s) Processing Responses: \$23.55
- d) Cost to Process Each Response: \$35.33
- e) Total Cost to Process Responses: \$445,095

- 2) Overall Labor Burden to the Federal Government
 - a) Total Number of Annual Responses: 12,600
 - b) Total Labor Burden: \$445,095

Part B: OPERATIONAL AND MAINTENANCE COSTS

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

Part C: TOTAL COST TO THE FEDERAL GOVERNMENT

- 1) Total Labor Cost to the Federal Government: \$445,095
- 2) Total Operational and Maintenance Costs: \$0
- 3) Total Cost to the Federal Government: \$445,095

15. Reasons for Change in Burden

The estimated response time for this request has increased significantly from 30 minutes to approximately 3 hours. The application process has not actually become more burdensome; the response time has increased because the online application contains both the AFROTC Form 20, which was previously covered by this request, as well as 12 previously separate forms. There has also been a general increase in the number of respondents.

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.