

## SUPPORTING STATEMENT - PART A

Statement of Ecclesiastical Endorsement – 0704-0190

### Summary of Changes from Previously Approved Collection

- Increase in burden to accurately reflect the hourly wages of the respondents.

#### 1. Need for the Information Collection

Per Department of Defense Instruction 1304.28 (DoDI 1304.28), " The Appointment and Service of Chaplains," in conjunction with 10 USC 532 and 12201, professionally qualified Religious Ministry Professionals shall be appointed as chaplains to provide for the free exercise of religion for all members of the military services, their dependents, and other authorized persons. Since World War I, the faith group that awarded them Religious Ministry Professional status has endorsed the professional qualifications of Religious Ministry Professionals. Religious Organizations (RO) listed with the Department of Defense are required to endorse or certify that Religious Ministry Professionals are fully credentialed and qualified to serve as chaplains in the Armed Forces. No Religious Ministry Professional person may become a chaplain without this endorsement, and the loss of endorsement constitutes a loss of professional status.

This information collection is needed to ensure that Chaplain applicants are appropriately credentialed and qualified to represent their DoD-Listed Religious-Endorsing Organization for service as chaplains in the Military Services. It also certifies the number of years of professional ministry experience for each applicant.

#### 2. Use of the Information

The DD Form 2088, "Statement of Ecclesiastical Endorsement," is used on occasion, whenever an ecclesiastical endorsing agency submits a Religious Ministry Professional, as an applicant to become a chaplain. The ecclesiastical endorsing agency sends it to the Military Service, which the Religious Ministry Professional wishes to join.

The three Military Services are required by DoD Instruction 1304.28, " The Appointment and Service of Chaplains," to obtain an endorsement of the professional qualifications of Religious Ministry Professionals applying for the chaplaincy. This endorsement is rendered in the form of an ecclesiastical endorsement from the Religious Ministry Professional's religious faith group. An ecclesiastical endorsement is an essential part of the application process for clergy to become chaplains. Both the military and the religious faith groups insist on ensuring that only professionally qualified Religious Ministry Professionals serve as chaplains. Without this formal process, the chaplaincy would cease to exist as a professional corps.

DD Form 2088, "Statement of Ecclesiastical Endorsement," is used to endorse that a Religious Ministry Professional is professionally credentialed and qualified to be a chaplain.

It requests information about name, address, professional experience, and previous military experience to be used in determining grade, date of rank, and eligibility for accession for applicant/appointees to the chaplaincies of the armed forces.

DD Form 2088, "Statement of Ecclesiastical Endorsement," has been used by the three Military Services to ensure that those Religious Ministry Professionals who applied to become chaplains were professionally credentialed and qualified and appropriately endorsed by their respective religious faith groups.

3. Use of Information Technology

100 percent of the DD 2088s are collected 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 is only gathered on occasion. The DD 2088 must only be filled out under specific circumstances: when an RMP is initially endorsed for service as a military chaplain; when a chaplain seeks a change in RO endorsement (new organization); when a chaplain changes status (active duty to guard, or reserve to active duty, for example); when a chaplain's credentials to represent the RO in the military is revoked.

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 Tuesday, March 26, 2024. The 60-Day FRN citation is 89 FR 20956.

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

A 30-Day Federal Register Notice for the collection published on Friday, June 28, 2024. The 30-Day FRN citation is 89 FR 53979.

## 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 Advisory is provided at the top of the DD Form 2088.

Privacy Impact Assessments (PIAs): Service PIAs are as follows:

Army: <https://www.army.mil/article/237060>

Navy: <https://www.doncio.navy.mil/ContentView.aspx?id=678>

USAF: <https://www.privacy.af.mil/Home/PIA/>

Coast Guard: PIA would be with Department of Homeland Security, but DoD-CIO office states that there are no personnel systems published.

Systems of Records Notices (SORNs): The collection of data on this form is stored in the following Systems of Records Notices:

Accession SORNS:

DoD Accessions: <https://dpcl.d.defense.gov/Privacy/SORNsIndex/DOD-Wide-Notices/DOD-Wide-Article-List/>

Department of the Navy:

<https://dpcl.d.defense.gov/Privacy/SORNsIndex/DOD-wide-SORN-Article-View/Article/570316/n01131-1/>

<https://dpcl.d.defense.gov/Privacy/SORNsIndex/DOD-wide-SORN-Article-View/Article/570628/m01133-3/>

Department of the Air Force:

<https://dpcl.d.defense.gov/Privacy/SORNsIndex/DOD-wide-SORN-Article-View/Article/569780/f036-aetc-r/>

Coast Guard Accessions: <https://www.govinfo.gov/content/pkg/FR-2008-12-19/html/E8-29845.htm>

Official Military Personnel Files:

Army: <https://dpcl.d.defense.gov/Portals/49/Documents/Privacy/SORNs/Army/A006-8-104-AHRC.pdf>

Navy: <http://dpcl.d.defense.gov/Privacy/SORNsIndex/DOD-wide-SORN-Article-View/Article/570310/n01070-3/>

Marine Corps: <http://dpcl.d.defense.gov/Privacy/SORNsIndex/DOD-wide-SORN-Article-View/Article/570626/m01070-6/>

Air Force: <http://dpcl.d.defense.gov/Privacy/SORNsIndex/DOD-wide-SORN-Article-View/Article/569821/f036-af-pc-c/>

National Guard Bureau:

<https://dpcl.d.defense.gov/Privacy/SORNsIndex/DOD-wide-SORN-Article-View/Article/570052/a0600-8-104b-ngb/>

Coast Guard: <https://www.federalregister.gov/documents/2008/12/19/E8-29793/privacy-act-of-1974-united-states-coast-guard-014-military-pay-and-personnel-system-of-records>

## 11. Sensitive Questions

No questions considered sensitive are being asked in this collection.

Partial Social Security Numbers are requested to help connect and verify the Religious Military Professional or Chaplain's individual religious organization to the individual's military personnel record and is the only identifier that can be used across all of DoD.

## 12. Respondent Burden and its Labor Costs

### Part A: ESTIMATION OF RESPONDENT BURDEN

#### 1) Collection Instrument(s)

DD2088

- a) Number of Respondents: 150
- b) Number of Responses Per Respondent: 10
- c) Number of Total Annual Responses: 1500
- d) Response Time: 45 minutes
- e) Respondent Burden Hours: 1,125 hours

#### 2) Total Submission Burden

- a) Total Number of Respondents: 150
- b) Total Number of Annual Responses: 1500
- c) Total Respondent Burden Hours: 1,125 hours

### Part B: LABOR COST OF RESPONDENT BURDEN

#### 1) Collection Instrument(s)

DD2088

- a) Number of Total Annual Responses: 1,500
- b) Response Time: 45 minutes
- c) Respondent Hourly Wage: \$21.90
- d) Labor Burden per Response: \$16.43
- e) Total Labor Burden: \$24,645

#### 2) Overall Labor Burden

- a) Total Number of Annual Responses: 1,500

b) Total Labor Burden: \$24,638

The Respondent hourly wage was determined by using the Department of Labor Wage Website ([https://www.bls.gov/oes/current/oes\\_nat.htm](https://www.bls.gov/oes/current/oes_nat.htm)) from 2022 (using SOC 43-000, Office and Admin Support Occupations, mean hourly wage)

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)

DD2088

- a) Number of Total Annual Responses: 1,500
- b) Processing Time per Response: 5 minutes
- c) Hourly Wage of Worker(s) Processing Responses: \$33.09
- d) Cost to Process Each Response: \$2.76
- e) Total Cost to Process Responses: \$4,140

2) Overall Labor Burden to the Federal Government

- a) Total Number of Annual Responses: 1,500
- b) Total Labor Burden: \$4,140

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: \$4,140
- 2) Total Operational and Maintenance Costs: \$0
- 3) Total Cost to the Federal Government: \$4,140

15. Reasons for Change in Burden

There has been an increase in burden to accurately reflect the hourly wages of the respondents who fill out the DD 2088.

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.