OMB Control Number 1625-0128 Extension

<u>SUPPORTING STATEMENT – PART A</u>

A. JUSTIFICATION

1. Need for the Information Collection

Collection of information is required to initiate enlistment of US Coast Guard enlisted personnel and commissioned officers. 14 USC 468 authorizes the United States Coast Guard to recruit personnel for military service. The information requested on the gocoastguard.com web site is collected in accordance with Section 503 of Title 10, United States Code, and may only be used to identify and process individuals interested in applying for enlistment or commission in the United States Coast Guard or Coast Guard Reserve. Records are maintained at USCG Headquarters in Washington, DC and recruiting offices.

2. Use of the Information

Information is initially requested from applicants in the Coast Guard recruiting website, gocoastguard.com Prospect Questionnaire or Chat Now or via the Officer Program Application and flows to the Coast Guard Direct Access system. Coast Guard Recruiting Command, Marketing Division manages the website. The purpose of the forms is to collect qualifying information and initiate the recruiting process, by providing this information to our recruiters so they can begin a vetting process to select qualified personnel to serve in the Coast Guard. The difference between the Prospect Questionnaire and the Officer Program Application are the target audience and the timing. The Prospect Questionnaire is an initial effort and more general in nature. It is primarily focused on gathering the minimal information necessary to begin the enlisted screening and application process and complete enlisted accession paperwork. The Officer Program Application gathers the necessary information to screen, provide commissioning board information and the commissioning process. It is usually administered after a Recruiting Office identifies the prospect as a viable officer candidate. Most prospects first complete the Prospect Questionnaire and later complete the Officer Application, after they have an initial discussion with a Recruiter and find that they may qualify for the Coast Guard's officer programs. This information populates recruiting forms which are used by Military Entrance Processing Command and United States Coast Guard to initiate pay and personnel records. Since our target audience responds to our online advertising, and uses the internet and social media, these forms provide an electronic means to communicate with and collect data from the general public we recruit.

3. Use of Information Technology

The collection on gocoastguard.com is electronic, but the website also allows the public to call or email Coast Guard recruiters to initiate the screening and recruiting process. For site navigation purposes only, cookies are used in a limited manner. Cookies are pieces of information that a website transfers to a user's computer's hard disk for record-keeping purposes. Cookies make the website more useful by storing information about users preferences on a particular site. The use of cookies is an industry standard, and many major websites use them to

provide useful features for their customers. Cookies in and of themselves do not personally identify users, although they do identify a user's computer. Most browsers are initially set up to accept cookies. If a user prefers, browsers are able to refuse cookies, but this may result in not being able to take full advantage of website capabilities. GoCoastGuard.com uses clear GIFs, or pixel tags, provided by CG ad-serving company to help manage online advertising. These clear GIFs allow our ad-serving company to recognize a browser's cookie when a browser visits this site. This allows CG to learn which banner ads bring users to our Web site. The information we collect and share through this technology is not personally identifiable (it does not include name, address, telephone number or email address).

Regarding Usability Testing, this ICR—

- Public-facing instructions were tested by the Coast Guard Recruiting Command to ensure the use of plain language. No changes were needed.
- Is not related to a public benefit program as detailed in OMB M-22-10 (titled "Improving Access to Public Benefits Programs Through the Paperwork Reduction Act" dated April 13, 2022).
- The Coast Guard Recruiting Command conducted Usability testing to determine if CG-Forms related associated with this information collection used plain language. All participants were members of the United States Coast Guard but were not affiliated with the program office. The Coast Guard Recruiting Command found that respondents understood the forms and had no questions regarding the content. As such, no changes were made to the collection.
- Is required by statute, and/or regulation as noted in section 1 of the Supporting Statement.

4. Non-duplication

Coast Guard Recruiting Command completed a review of all CGRC recruiting forms and is in the process of eliminating Recruiting Office duplicate screening forms, while complying with MEPCOM and USCG enlistment and commissioning requirements. The Prospect Questionnaire collects all of the minimal information necessary to begin the enlisted screening and application process and complete an enlisted paperwork. The Officer Program Application reduces the number of required forms for officer applications from 23 to 1. The Chat Now Questionnaire requests minimal information to assist both chat recruiters and prospects to explore relevant enlisted and officer programs without burdening the prospect for more detailed information that will later be collected in the Prospect Questionnaire and/or Officer Program Application. As the first interaction with individuals pursuing USCG employment, this collection allows for initial population of the database used for generating future forms, which reduces the burden on applicants for those future information collections.

5. Burden on Small Business

This information collection does not have an impact on small businesses or other

small entities.

6. Less Frequent Collection

This collection is only conducted once per respondent. Without that single collection, Coast Guard recruiters would not have the minimal information they need to begin the recruiting process. This would substantially negatively impact their ability to recruit the quantity of personnel needed for the US Coast Guard to accomplish its organizational missions.

7. Paperwork Reduction Act Guidelines

The collection is wholly consistent with the guidelines delineated in 5 CFR 1320.5(d)(2).

8. Consultation and Public Comments

A 60-day Notice was published in the Federal Register to obtain public comment on this collection (See [USCG-2024-0733]; (September 4, 2024, 89 FR 71915) and 30-Day Notice (December 9 2024, 89 FR 97642) were published in the Federal Register to obtain public comment on this collection. The Coast Guard has not received any comments on this information collection.

a. Consultation regarding industry best practices for this type of collections was made with other military recruiting commands as well as commercial agencies specializing in advertising and the military application process. Additional consultations were made with past respondents of this collection regarding the clarity of instructions, response burden, and availability of information.

9. Gifts or Payment

There is no offer of monetary or material value for this information collection.

10. Confidentiality

There are no assurances of confidentiality provided to the respondents for this information collection.

This information collection request is covered by the Privacy Impact Assessment for Direct Access conducted on 9 Nov 2016 (DHS/USCG/PIA-024 Direct Access) and the Military Pay and Personnel System of Records Notice (DHS/USCG-014) published in Federal Register Volume 76 Number 209 (28 Oct 2011).

11. Sensitive Questions

Questions of a sensitive nature in this collection include SSN and race and ethnicity. This information is used in multiple places in the hiring process including forms for US

MEPCOM. This collection populates a database used to automatically generate those required forms for applicant review and signature – significantly reducing their response burden. A description of the uses of the collected data is included in a Privacy Act Statement accompanying the collection.

12. Respondent Burden, and its Labor Costs

a. Estimation of Respondent Burden

Approximately 50,000 prospects and/or centers of influencer (parents, guidance counselors, coaches, etc) who may influence prospect's recruitment decision, visit U.S. Coast Guard recruiting website gocoastguard.com for information about U.S. Coast Guard enlisted and officer opportunities. The burden is estimated through sampling of recruiters completing the Prospect Questionnaire, the Chat Questionnaire and Officer Program Application

Type of	Form Name /	# of	# of	# of	Average Burden	Total Annual
Respondent	Form Number	Respondents	Responses	Responses	per	Burden
			per		Respons	(in
			Respondent		e (in	hours)
					hours)	
Individuals	Prospect	27.007	4	07.007	20	0.000
or	Questionnair	27,887	1	27,887	.33	9,203
Households	e CGRC-					
	1130					
Individuals	Officer		_			
or	Application	2,375	1	2,375	.33	784
Households	CGRC-1131					
Individuals	Chat Form		_			
or	CGRC-1132	19,738	1	19,738	.083	1638
Households						
Total		50,000		50,000		11,625

b. <u>Labor Cost of Respondent Burden</u>

According to the U.S. Department of Labor, Bureau of Labor Statistics Employment Situation Table B-3, accessed Mar 2024, the national average hourly earnings for all employees on private/non-farm payrolls, to include each industry sector, is estimated to be \$34.69 per hour. Therefore, the estimated burden hour cost to respondents is \$403,271.25 annually at the total estimated burden of 11,625 hours annually.

13. Respondent Costs Other Than Burden Hour Costs

There are no capital, start-up or maintenance costs associated with this information collection.

14. Cost to the Federal Government

There are no costs incurred to the Federal Government that would not have already been incurred without this information collection.

15. Reasons for Change in Burden

After consultation with respondents and recruiters who administer the collection, it was determined that an average response burden of 20 minutes for the CGRC-1130 and CGRC-1131 is a more accurate estimate than the previously used 30 minutes.

16. Publication of Results

USCG does not intend to employ the use of statistics or the publication thereof for this information collection.

17. Non-Display of OMB Expiration Date

The Coast Guard will display the expiration date for OMB approval of this information collection.

18. Exceptions to "Certification for Paperwork Reduction Submissions"

The Coast Guard does not request an exception to the certification of this information collection.