

## SUPPORTING STATEMENT - PART A

Appointment of Chaplains for the Military Services – OMB Control Number 0704-0190

### 1. Need for the Information Collection

Per Department of Defense Directive 1304.19 (DoDD 1304.19), "Appointment of Chaplains for the Military Departments," and Department of Defense Instruction 1304.28 (DoDI 1304.28), "Guidance for the Appointment of Chaplains for the Military Departments," 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 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 religious faith groups are appropriately organized and authorized by their constituencies to endorse clergy for service as chaplains in the Military Services. It also certifies the number of years of professional experience for each candidate.

### 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 a candidate 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 Directive 1304.19, "Appointment of Chaplains for the Military Departments," and DoD Instruction 1304.28, "Guidance for the Appointment of Chaplains for the Military Departments," 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 qualified to become 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 promotion for 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 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 for the collection published Monday, April 9, 2018. The 60-Day FRN citation is 83 FRN 15133.

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

A 30-Day Federal Register Notice for the collection published Friday, June 29, 2018. The 30-Day FRN citation is 83 FRN 30703.

## 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

A Privacy Act Statement is provided at the top of the DD Form 2088.

Privacy Impact Assessments (PIAs): The Service PIAs are listed, as follows:

Army: <http://ciog6.army.mil/PrivacyImpactAssessments/tabid/71/Default.aspx>

Navy: <http://www.doncio.navy.mil/uploads/EMPRS%20PIA.pdf>

USAF: <http://www.privacy.af.mil/pia/index.asp>

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:

<http://dpclo.defense.gov/Privacy/SORNsIndex/DODwideSORNArticleView/tabid/6797/Article/6148/a0601-100-ahrc.aspx>

<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/>

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

<http://edocket.access.gpo.gov/2008/E8-29845.htm>

Official Military Personnel Files:

Army: <http://dpcl.d.defense.gov/Privacy/SORNsIndex/DOD-wide-SORN-Article-View/Article/570051/a0600-8-104b-ahrc/>

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/>

Coast Guard: <http://edocket.access.gpo.gov/2008/E8-29793.htm>

11. Sensitive Questions

No questions considered sensitive are being asked in this collection.

Social Security Numbers are requested to 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. A Social Security Number Justification Memo has been included as part of the OMB submission package for this collection.

12. Respondent Burden and its Labor Costs

a. Estimation of Respondent Burden

1. DD Form 2088

- 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** (Summation or average based on collection)

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

## b. Labor Cost of Respondent Burden

1. DD Form 2088
  - a. Number of Total Annual Responses: 1,500
  - b. Response Time: 1,125 Hours
  - c. Respondent Hourly Wage: \$16.50
  - d. Labor Burden per Response: \$12.38
  - e. Total Labor Burden: \$18,570

### **2. Overall Labor Burden**

- a. Total Number of Annual Responses: 1,500
- b. Total Labor Burden: \$18,570

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 May 2016.

## 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

### a. Labor Cost to the Federal Government

1. Electronic Collection of DD 2088
  - a. Number of Total Annual Responses: 1,500
  - b. Processing Time per Response: 5 minutes
  - c. Hourly Wage of Worker(s) Processing Responses: \$31.50
  - d. Cost to Process Each Response: \$2.63
  - e. Total Cost to Process Responses: \$3,945

### **2. Overall Labor Burden to Federal Government**

- a. Total Number of Annual Responses: 1500
- b. Total Labor Burden: 125 hours

Processing officials are HR personnel paid at the GS-12 level for the Military Departments and OSD Components. Wage data is based on the General Schedule pay scale for 2018. (<https://www.opm.gov/policy-data-oversight/pay-leave/salaries-wages/2018/general-schedule/>)

## b. Operational and Maintenance Costs

- a. Equipment: \$0

- b. Printing: \$0
- c. Postage: \$0
- d. Software Purchases: \$0
- e. Licensing Costs: \$0
- f. Other: \$0
- g. Total: \$0

- 1. Total Operational and Maintenance Costs: \$0
- 2. Total Labor Cost to the Federal Government: \$3,945
- 3. Total Cost to the Federal Government: \$3,945

15. Reasons for Change in Burden

This is a reinstatement with change to an expired collection. The burden is being updated due to agency discretion and to bring the collection closer into line with the number of individual religious organizations that may be expected to fill out the DD Form 2088 over any given year. Though the number of responses and time burden is rising, the cost burden is decreasing 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.