

SUPPORTING STATEMENT

A. Justification.

Explain the circumstances that make the collection of information necessary.

1. The collection of information is necessary to meet the Department of Defense's (DoD) requirement for cashing personal checks overseas and afloat by DoD disbursing activities, as provided in the attached copy of 31 U.S.C. 3342. The attached copy of Chapter 4 of Volume 5 of the DoD Financial Management Regulation (FMR) provides procedures for using the DD Form 2761, Personal Check Cashing Agreement, which includes the eligibility criteria for check cashing services as well as a list of those individuals that may be authorized to receive check cashing services.

Indicate how, by whom and for what purpose the information is to be used.

2. The attached DD Form 2761, Personal Check Cashing Agreement, is designed exclusively to help DoD disbursing offices expedite the collection process of dishonored checks. The front of the form will be completed and signed by the authorized individual requesting check cashing privileges. By signing the form, the individual is freely and voluntarily consenting to the immediate collection from his/her current pay, without prior notice, for the face value of any check cashed, plus any charges assessed against the government by a financial institution, in the event the check is dishonored. The information needed to complete the form can be obtained from the individual's leave and earnings statement. The DoD disbursing office will retain the form. The reverse side of the form is a Pay Adjustment Authorization (PAA). In the event a check is dishonored, the disbursing office will complete and certify the reverse side of the form and forward it to the applicable payroll office. The disbursing officer's certification gives the payroll office the authority to deduct the amount indicated on the form from the individual's pay. The payroll office is then required to inform the submitting disbursing office of the action taken by certifying the PAA as indicated. The completed form will be used to support the disbursing officer's Statement of Accountability (Standard Form 1219).

Describe whether, and to what extent, the collection of information involves the use of automated, electronic, mechanical, or other technological collection techniques of other forms of information technology and the basis for the decision for adopting this means of collection.

3. The DD form 2761 is available in fillable PDF format or fillable FormFlow versions from the DoD Forms repository on the World Wide Web. Respondents may complete the form online, print and fax or mail the completed form for processing. The DFAS eForms Modernization initiative is in the process of transitioning to electronic data capture from the DFAS web site for all DoD customers.

Describe efforts to identify duplication. Show specifically why any similar information already available cannot be used or modified for use for purposed described in item 2. above.

4. Investigation resulted in no findings of duplication of records. Although the DoD currently uses the DD Form 139, Pay Adjustment Authorization, to process pay adjustments for military personnel, its use is not normally associated with the actual check cashing process. The Personal Check Cashing Agreement, DD Form 2761 encompasses the check cashing authorization and collection authority, if needed, in one form. The DD Form 2761 is the only collection instrument available for civilians who cash checks that become dishonored.

If the collection of information impacts small businesses or other small entities describe any methods used to minimize burden.

5. This information collection does not have significant impact on small businesses or other small entities.

Describe the consequence to Federal program or policy activities if the collection is not conducted or is conducted less frequently, as well as technical or legal obstacles to reducing burden.

6. If the data is not collected, the only means of collection available to the disbursing officer is via the due process procedures. Due process is lengthy, requiring the disbursing office to demonstrate that the debtor has received demand letters and notices of intent to offset the debtors pay. Locating and informing debtors under due process procedures often proves difficult and unsuccessful due to transfers, relocations and discontinued service. Use of the DD Form 2761 greatly increases the ability to collect the debt and reduce losses to the Government. Therefore, the burden on the respondent cannot be reduced.

Explain any special circumstances that require the collection to be conducted: (see DoD 8910.1-M, Figure C3.F3).

7. There are no special circumstances that require this collection to be conducted in a manner inconsistent with the guidelines in 5 CFR 1320.5(d)(2).

If applicable, provide a copy and identify the date and page number of publication in the Federal Register of the agency's notice soliciting comments on the information collection prior to submission to OMB.

8. The Federal Register Notice for this collection of information was published on November 27, 2006, page 68565 (copy attached). One public comment was received. The comment proposed changes to existing laws and DoD policies and procedures in the arena of military and foreign banking. The proposal has no impact of the applicability of the use of this form to affect collection of monies owed for dishonored checks in the current operating environment.

Explain any decision to provide any payment or gift to respondents, other than re-enumaration of contractors or grantees.

9. No payments or gifts will be provided to respondents.

Describe any assurance of confidentiality provided to respondents and the basis for the assurance in statute, regulation, or agency policy.

10. Respondents are assured protection of their information via the Privacy Act Statement displayed on the DD Form 2761. DFAS certifies that the information collected is maintained in accordance with the Privacy Act of 1974, and OMB Circular A-130, Management of Federal Information Resources.

Provide additional justification for any question of a sensitive nature, such as sexual behavior and attitudes, religious beliefs and other matters that are commonly considered private.

11. No sensitive questions are asked of the respondents.

Provide estimates of the hour burden of the collection of information. (see DoD 8910.1-M, Figure C3.F3 for detailed description).

12 Estimation of Respondent Burden:

Number of Respondents:	46,153
Responses per Respondent:	1
Time Required per Response:	15 minutes
Total Burden Hours	11,538

Annual Cost to Respondent:

The estimate of annualized cost to respondents for the hours of burden for the collection of information is \$160,496.58. The hours of burden are based on the average hourly rate of \$13.91 for a GS-5, Step 5, as published in the Federal Civil Service 2007 Pay Structure.

Provide an estimate of the total annual cost burden to respondents or recordkeepers resulting from the collection of information.

13. There are no capital and start-up costs involved in this information collection.

Provide estimates of annualized cost to the Federal Government.

14. The annualized cost to the Federal Government associated with collecting this information is estimated, as follows:

Printing	46,153 forms per yr. @ \$0.05	=	\$ 2,307.65
Processing	GS-5, Step 5 salary @ 12 minutes per form (\$2.76 X 46,153)	=	<u>\$127,382.28</u>
		Total =	\$129,689.93

Explain the reasons for any program changes or adjustments reported in Items 13 or 14 of the OMB Form 83-I.

15. The burden decreased due to a reduction in the number of respondents.

For collections of information whose results will be published, outline plans for tabulation and publication.

16. The information collected will not be published or tabulated.

If seeking approval to not display the expiration date for OMB approval of the information collection, explain the reason that display would be inappropriate.

17. The OMB expiration date and approval will be printed and displayed on the form used to collect the information.

Explain each exception to the certification statement.

18. There are no exceptions to the certification statement identified in Item 19 of the OMB Form 83-I.

B. Collections of information employing statistical methods

This collection of information does not employ statistical methods.