

SUPPORTING STATEMENT

Dependency Statements - Parent (DD Form 137-3), Child Born Out of Wedlock (DD Form 137-4), Incapacitated Child Over Age 21 (DD Form 137-5), Full Time Student 21 - 22 Years of Age (DD Form 137-6), and Ward of a Court (DD Form 137-7)

A. Justification

1. This information collection allows the Government to determine the degree of financial support a military member provides a dependent and, if adequate, authorizes the benefits. Pursuant to 37 U.S.C. 401, 403, 406 and 10 U.S.C. 1072 and 1076 the member must provide at least one-half of claimed dependents' monthly expenses. The DoDFMR 7000.14, Volume 7A defines the definition of dependent, directs the requirement to prove in-fact dependency, and also prescribes the forms to be used. To prevent abuse of these benefits, and to comply with the above-cited statutes, the information requested is needed to substantiate the receipt of the benefit.
2. For members to apply for benefits, they must complete the appropriate "Dependency Statement". Dependency claims examiners use the information from these forms to determine the degree of financial support a member provides a dependent and, if adequate, authorizes the benefits. Without this information, it would be uncertain if an entitlement to a benefit exists. This collection of information decreases the possibility of monetary allowances and Uniformed Services Identification (USIP) card benefits being approved in behalf of ineligible dependents. The requirement to complete these forms helps alleviate the opportunity for fraud, waste, and abuse of dependent benefits. The DD Form 137-3, "Dependency Statement - Parent", is submitted by the member to claim a parent, parent-in-law, stepparent, in-loco-parent, or parent by adoption for monetary allowances and/or a USIP Card. The DD Form 137-4, "Dependency Statement - Child Born Out of Wedlock Under Age 21", is submitted to claim a child born out of wedlock for a USIP Card. The DD Form 137-5, "Dependency Statement - Incapacitated Child Over Age 21", is submitted to claim an incapacitated child over age 21 for monetary allowances or a USIP Card. The DD Form 137-6, "Dependency Statement - Full Time Student 21 - 22 Years of Age", is submitted to claim a student for monetary allowances. The DD Form 137-7, "Dependency Statement - Ward of a Court", is submitted to claim a minor designed as a Ward of a Court for monetary allowance.

3. The DD 137 series forms are 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 and print and mail the completed form for processing. The Department of Defense requires a witnessed signature and hard copy certification of these documents. Thus, currently, there is no cost-effective way to apply information technology to this collection process.
4. No similar information or verification procedures exist within the Department of Defense which can be used for this specific purpose.
5. No small businesses or other entities are significantly impacted by this information collection.
6. Financial information and living arrangements change frequently; therefore, new dependency statements must be completed on a regular basis. Current requirement is annually and members are advised of the responsibility to re-accomplish as the need arises other than at the annual basis. Less frequent collection of information could result in more ineligible members receiving benefits.
7. There are no special circumstances. The collection of information will be conducted in a manner consistent with the guidelines in 5 CFR 1320.5(d)(2).
8. A 60 day *Federal Register* notice was published on June 15, 2007(72 FR 33207). Copy attached. No comments were received.
9. No payments or gifts will be provided to the respondents, other than payment paid as benefits resulting from meeting eligibility requirements.
10. The forms state "Routine Uses" indicating who may be furnished information as required by the Privacy Act. The Defense Finance and Accounting Service certifies that the information collected is maintained in accordance with the Privacy Act of 1974; OMB Circular A-130, Management of Federal Information Resources; and FIRMR Bulletin B-1 and is covered under DFAS Privacy Act System of Records Notice T340, DJMS - Active Component; T7346, DJMS - Reserve Component; T7347b, Retired and Annuitant Pay; and MFD00003 - Marine Corps Total Forces System. The SSN and other identifying information for the member and dependents are needed to pay the proper person,

ensure entitlement to pay, and for tax purposes. Without the SSN identifying information, payments for BAQ with dependents could not be processed.

11. There are no questions of a sensitive nature, such as those pertaining to sexual behavior and attitudes, religious beliefs, and other matters usually considered private.
12. (a) Respondent Burden:
Responses per Respondent: 1
Number of Respondents: 19,440
Response time: 1.25 hours
Annual Burden: 24,300 hours

(b) Respondent Costs:
Cost to each respondent involves about 1.25 hours of time for completion of each form for a total cost of \$484,299.00 based on a GS-8 hourly wage ($\$19.93 \times 1.25 \text{ hours} \times 19,440 \text{ responses}$). The cost of postage is negligible.
13. There are no capital or start-up costs associated with this information collection. Postage is negligible and a notary public is available at no charge to military personnel through their legal offices.
14. The estimated annualized cost associated with government review totals \$493,824.60

Printing: 19,440 forms per year @ \$0.10 = \$1,944.00

Mailing: 19,440 forms per year @ \$0.39 = \$7,581.60

Processing: GS-8 hourly wage of \$19.93
15. This is an extension of a previously approved collection.
16. Results of the collection of information will not be published.
17. Approval is not sought for avoiding display of the expiration date for OMB approval of the information collection.
18. There are no exceptions to the certification statement identified in Item 19, "Certification for Paperwork Reduction Act Submission," of OMB Form 83-I.

B. Collections of Information Employing Statistical Methods

1. The collection of information does not employ statistical methods.