

SUPPORTING STATEMENT

Application for Department of Defense Common Access Card – DEERS Enrollment

A. JUSTIFICATION

1. Need for Information Collection

In a post 9/11 era, the Department of Defense is taking all requisite measures to enhance security for physical access to DoD facilities and logical access to DoD networks. This is being accomplished by applying prudent countermeasures for all potential vulnerabilities focusing on security actions to address the changes in today's heightened threat conditions. Public Law 106-65, Section 373 (Tab 1) directs the Department to develop and implement a Smart Card program for the DoD. Based on this mandate, several memos and policies were written to incorporate the use of smart card technology into the DoD infrastructure. The Deputy Secretary of Defense November 10, 1999 memorandum, Subject: Smart Card Adoption and Implementation (Tab 2), directs the Department to implement smart card technology as a Department-wide Common Access Card (CAC) that shall be the standard ID card for active duty Uniformed Services' personnel (to include the Selected Reserve and National Guard), DoD civilian employees and eligible contractor personnel, be the principal card used to enable physical access to buildings and controlled spaces, and will be used to gain access to the Department's computer networks and systems. The Assistant Secretary of Defense for Network Information Integration (NII) memorandum, Subject: Department of Defense (DoD) Public Key Infrastructure (PKI) (Tab 3), directs use of a common, integrated, interoperable DoD PKI to enable security services at multiple levels of assurance. PKI is a key and certificate management infrastructure designed to support confidentiality, integrity, availability, authorization, and access control in computer networks. This data collection is a step in that direction by prohibiting access to the Departments' systems to those not authorized. Further guidance was provided in the USD (Personnel and Readiness) and DoD CIO April 18, 2002 joint memorandum to allow non-DoD federal employees requiring logical access to become eligible for the CAC (Tab 4). The Deputy Secretary directed the CAC be issued and maintained using the infrastructure provided by the Defense Enrollment Eligibility Reporting System (DEERS) and the Realtime Automated Personnel Identification System (RAPIDS) and that initial implementation of the CAC begin no later than December 30, 2000.

In August 2004, the Homeland Security Presidential Directive – 12 was signed (Tab 5). This mandated Homeland Security Presidential Directive - 12 (HSPD-12), dated August 27, 2004, directed the promulgation of a federal standard for secure and reliable forms of identification for Federal employees and contractors that will be interoperable among the federal departments and agencies. The resulting standard, Federal Information Processing Standard (FIPS) 201-1, defines the requirements for Personal Identity Verification (PIV) credentials that: are issued only when an individual's identity and background have been properly vetted and positively adjudicated; are strongly resistant to identity fraud, tampering, counterfeiting, and terrorist exploitation and; can support rapid electronic authentication.

The Department of Defense will migrate the Common Access Card (CAC) program to meet HSPD-12 requirements. This will impact the current CAC holder populations including Active Duty military personnel, members of the Selected Reserve and National Guard, DoD Civilian employees, eligible contractor personnel and other eligible DoD affiliates as formerly addressed in OSD CAC Memorandums stated above. The CAC is the principal PIV credential used to enable physical access to buildings and other controlled spaces, and for logical access to the Department's computer networks and systems. The CAC platform contains the mandatory identification elements as well as physical and logical access capabilities required by the DoD.

This information collection is needed to obtain the necessary data to establish eligibility for the CAC for those individuals not pre-enrolled in the DEERS, and to maintain a centralized database of eligible individuals.

2. Use of the Information

The purpose of this information collection is multifold: it is used to verify eligibility for the DoD CAC for individuals either employed by or associated with the Department; it is used to control access to DoD Installations and facilities and DoD computer systems; and it provides population demographic reports and mobilization dependent support. The DD Form 1172-2, *Application for Department of Defense Common Access Card – DEERS Enrollment* (Tab 6), the form associated with this information collection, is used to collect the relevant data from the respondent. The information may be released to Federal and State agencies and private entities, on matters relating to utilization review, professional quality assurance, program integrity, civil and criminal litigation, and access to Federal government facilities, computer systems, networks, and controlled areas.

The respondents included in this information collection are: eligible contractor employees (e.g. contractor employees who need access to DoD systems, or facilities on a regular basis as determined by the local command), eligible foreign nationals (e.g., foreign nationals who need access to DoD systems or facilities on a regular basis as determined by the local command), as well as other eligible individuals outside DoD who require log on access to a DoD network either remotely or on a DoD installation.

3. Improved Information Technology

The Realtime Automated Personnel Identification System (RAPIDS) has been developed to facilitate collection of the information on the DD Form 1172-2, link the data collected to the central DEERS database, and produce the DoD CAC. This system provides error-free data entries for those pre-enrolled in DEERS and requires the respondent, when pre-enrolled, to update only changed information.

DMDC is working towards a solution that will require CAC eligible personnel to be enrolled to DEERS through a verified automated data feed directly to DEERS. This will eliminate the requirement to use the manual version of this form for most of the CAC eligible population. A lockdown of DEERS for all active duty military, reservists, and DoD civilian

employees was accomplished in April 2004 and the contractors were locked down in August of 2006. All contractors are now entered into DEERS through a tool called the Contractor Verification System (CVS). CVS is an online version of the DD Form 1172-2. While CVS is operational there will still be a portion of the population that will not have access to the electronic version of this form. (those in remote locations and those personal that require logical access but have no association with the Department). For this reason, a manual version of the form will be available for those that do not have access to the electronic version.

4. Efforts to Identify Duplication

No other government agency is responsible for this program. There is no other information collection which duplicates the information collected on this form.

5. Methods Used to Minimize Burden on Small Entities

Collection of this information does not involve small entities.

6. Consequences of Not Collecting the Information

If information collection were stopped, the DoD would not register and issue a PKI certificate to newly hired DoD employees or other eligible CAC recipients who are authorized access to DoD facilities and systems. If collection were less frequent, eligible employees who are not already in the DEERS database would not be able to use computer systems and support provided would suffer.

7. Special Circumstances

There are no special circumstances associated with this data collection.

8. Agency 60-Day Federal Register Notice and Consultations Outside the Agency

An agency 60-day Federal Register Notice was published on January 26, 2007, Volume 72, Number 17, pages 3797-3798 as required by 5 CFR 1320.8(d) (Tab 7). No comments were received.

This information collection was reviewed and approved by the following:

OSD/WHS	Mr. Vahan Moushegian	703-607-2976
OSD/WHS	Mr. Dave Henshall	703-696-3243
OUSD (P&R)	Mr. Johnny Lopez	703-696-8294
OASD (NII)	Mr. Paul Grant	703-604-1477
USA	Mr. Elbert Jackson	703-325-0202
USN	Mr. William Weaver	901-874-3467
USAF	Ms. Karen Bennett	210-565-2689
USMC	Mrs. Mary Stroz	703-784-9529
USCG	CWO2 Tina Tenneyson	202-267-2257
NOAA	Ms. Neavely Touraj	301-713-3453
PHS	Ms. Mary Boone	301-443-9000

9. Payments to Respondents

No payments will be made to respondents for completion of the DD Form 1172-2.

10. Assurance of Confidentiality

This information collection does not ask the respondent to submit proprietary, trade secrets, or confidential information to the Department.

The information is collected and stored in the DEERS database. Database users are required to log in to DEERS using their PKI certificates on their CAC. These protective measures safeguard the access to DEERS to authorized users only. Respondents are asked to read the Privacy Act Statement prior to signing the DD Form 1172-2. All data are protected by the Privacy Act of 1974 and are protected according to the regulations therein and by related DoD instructions and directives.

11. Sensitive Questions

The gender of the individual is requested for demographic tracking purposes only. Gender is not a factor in the determination of eligibility.

The Social Security Number (SSN) is also requested to determine eligibility of legislative mandated benefits and entitlements. Attached is System of Record entitled Defense Eligibility Records (October 1, 2007, 72 FR 55757) (Atch 8). In DoD military and civilian personnel systems it is the personnel identifier. It is also used as the Geneva Conventions Number for the Armed Forces and those civilians or contractors accompanying the forces.

To meet the Geneva Conventions requirements of the ID card, the individual's serial number **must** be printed on the card. Although the decision to use the SSN is a DoD policy decision, a number, unique to the individual, must be printed on the card.

The Office of Management and Budget (OMB) has required that every Federal agency develop and implement a plan to reduce the unnecessary use of the Social Security Number. The SSN Reduction Tiger Team is charged with developing and overseeing the implementation of the DoD SSN Reduction Plan. The DoD Tiger Team had its first meeting on October 2, 2007 and over the next year; they will formulate recommendations for the reduction of the use of the SSN. Once the recommendations have been approved, appropriate actions will be taken on usage of the SSN to this form.

12. Estimates of Response Burden and Annual Cost to the Respondent

A. Response Burden:

(1) DD Form 1172-2

Total annual respondents:	300,000
Frequency of response:	Once every three years, or as required
Total annual responses:	300,000
Burden per response:	10 minutes
Total burden hours:	6,000,000 minuts/60=50,000 hours

B. Explanation of How Burden was Estimated. The burden of 10 minutes was estimated by observation of the process.

C. Labor Cost to Respondent:

The labor cost to respondent is calculated in the following manner:

(low grade employees) 160,000 respondents x \$5.85	\$936,000
(medium grade employees) 100,000 x \$7.20	720,000
(high grade employees) 40,000x \$16.20	<u>648,000</u>
Total	\$2,304,000

13. Estimates of Cost Burden for Collection of Information

A. Total Capital and Start-up Cost – There are no capital or start-up costs associated with this data collection. Respondents will not need to purchase equipment or services to respond to this information collection.

B. Operation and Maintenance Cost – There are no operation or maintenance costs associated with this information collection.

14. Estimates of Cost to the Federal Government

Printing 300,000 forms at \$.044 per form equals \$13,200. A copy is given to the respondent.

Personnel specialists entering information, reviewing, and processing the form are military personnel (average military pay grade E-4 [hourly pay \$19.00]) or federal civilian employees (average grade GS-4/step 5 [hourly pay \$12.44]).

$E-4 \$19.00/hr + GS-4/Step 5 \$12.44/hr = \$25.22$ average hourly wage

$300,000 \text{ respondents} \times 12 \text{ mins for data entry/issuance divided by } 60 = 60,000 \text{ hrs}$

$60,000 \text{ hours} \times \$25.22 \text{ avg hrly wage} = \$1,513,200$

Total estimated cost to the Government = \$1,526,400.

15. Changes in Burden

In addition to digital signatures on the DD Form 1172-2, the DD Form 1172-2 has been automated via writeable pdf which has resulted in a reduction of the burden minutes to complete the form.

16. Publication Plans/Time Schedule

The results of collection of this information will not be published for statistical use.

17. Approval Not to Display Expiration Date

Approval not to display the expiration date is not being requested.

18. Exceptions to the Certification Statement

No exceptions to the certification statement are being requested.

B. COLLECTION OF INFORMATION EMPLOYING STATISTICAL METHODS

Statistical methods are not employed for collection of this information.