

SUPPORTING STATEMENT

Application for Discharge of Member or Survivor of Member of Group Certified to Have Performed Active Duty with the Armed Forces of the United States

A. JUSTIFICATION

1. Need for Information Collection.

38 U.S.C. § 106 note (Public Law No. 95-202, § 401, 91 Stat. 1449) directs the Secretary of Defense to determine if civilian employment or contractual service rendered by groups to the Armed Forces of the United States shall be considered active duty (Atch 1). This information collection is necessary to assist each of the Military Departments in determining if an applicant was a member of a group which has been found to have performed active military service and to assist in issuing an appropriate certificate of service. The information is also needed by the Veterans Administration to provide substantiation for benefits eligibility.

2. Use of Information.

The purpose of this information collection is to assist the Secretary of a Military Department or United States Coast Guard (USCG) in determining if an applicant was a member of a group that has been found to have performed active military service. If the information requested on the DD Form 2168, *Application for Discharge of Member or Survivor of Member of Group Certified to Have Performed Active Duty with the Armed Forces of the United States*, (Atch 2) is compatible with that of a corresponding approved group and the applicant can provide supporting evidence, he or she will receive veteran's status in accordance with the provisions of DoD Directive 1000.20, as established by 38 U.S.C. § 106. The information from the DD Form 2168 will be extracted by the appropriate military personnel office and used to complete the DD Form 214, "Certificate for Release or Discharge from Active Duty." The Veterans Administration uses information on the DD Form 2168 to verify benefits eligibility.

Over the past three years, the information extracted from the DD Form 2168 has been used to determine if an applicant was a member of a group which has been found to have performed active military service, and after an affirmative finding, to assist the Secretary of a Military Department or United States Coast Guard in issuing an appropriate certificate of service.

3. Improved Information Technology.

It was determined that there is no cost-effective way to apply current information technology to this information collection, other than through access to the electronically-generated form which will be available on the World Wide Web at the Defense Link/Publications site. The form can be filled out on the computer and downloaded. After further review, the Services continue to agree that it would not be beneficial to the government

for members of the public to submit this form on line with an electronic signature, since there would be more chances of fraudulent claims being filed. In addition each DD Form 2168 must be accompanied by supporting documentation to verify benefits eligibility and not all persons submitting applications will have the capability to create adobe acrobat files to transmit documentation via email. Submittal by mail is the best proven method for each Service to process these claims.

4. Efforts to Identify Duplication.

There is no duplication since the applicants have no formal connection with the Department of Defense or United States Coast Guard. In most cases the Department of Defense or the United States Coast Guard will have no records pertaining to the applicant. The applicant must prove membership in an approved group.

5. Methods to Minimize Burden on Small Entities.

This information collection does not involve small business or other small entities.

6. Consequences of Not Collecting the Information

If the collection of information were not accomplished, the Department of Defense and the United States Coast Guard would not be able to comply with the current law. The program can only be administered using information collected from the individual.

7. Special Circumstances.

There are no special circumstances. This collection will be conducted in a manner consistent with the guidelines contained in 5 CFR 1320.5(d)(2).

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

An agency 60-Day Federal Notice was published in Volume 72, Number 105, Friday, June 1, 2007 Federal Register, pages 30555 - 30556, as required by 5 CFR 1320.8(d) (Atch 3). No public comments were received in response to the notice.

This information collection has been reviewed by the following individuals:

<u>Name</u>	<u>Organization</u>	<u>Phone Number</u>
Ms. Elizabeth Tatum	US Army	(314) 592-1249
Mr. John A. Smith	US Air Force	(210) 565-4776
Mr. Kimric Chapman	US Navy	(703) 695-6417
LCDR Michael Washburn	US Coast Guard	(304) 728-9100
Mr. James M. Ellis	OUSD (P&R) (MC&FP)	(703) 602-5009

9. Payments to Respondents

No payment or gift will be made to respondents.

10. Assurance of Confidentiality

This information collection does not ask the respondent to submit proprietary, trade, or confidential information. Information contained on this form is handled in a manner similar to other personnel records. The Privacy Act of 1974 is complied with.

11. Sensitive Questions

The Department is currently developing a plan to identify and eliminate the unnecessary use of Social Security Numbers (SSNs) in DoD. Once this plan is in place, every new and existing DoD Form will have been evaluated to determine necessary and unnecessary SSN use. We have completed an interim evaluation at this time on the DD Form 2168 and have determined that the SSN is required because the collection of the applicant's SSN in Block I.2 is essential to carry out the statutory and regulatory mandates in a responsible manner. The SSN is essential to provide a successful applicant a DD Form 214, *Certificate of Release or Discharge from Active Duty*, that can be presented to the Department of Veteran Affairs (VA) for benefits. After completion of the verification process the Service issues the successful applicant a DD Form 214 with the annotation, "This document, issued under PL 95-202, administratively establishes active duty service for purpose of Department of the Veteran Affairs benefits." The VA recognizes the DD Form 214 and offers benefits based on the information on the form. The SSN identifies the individual who provided the service warranting benefits. The SSN is essential to avoid fraud as it is a universal identifier.

Each of the Services and the United States Coast Guard have a Systems of Records Notice (SORN) in support of the DD Form 2168 (Atch 4). Not included is a SORN for the U.S. Marine Corps. Those who seek credit for service with the U.S. Marine Corps submit their completed DD Form 2186 to the Department of the Navy for consideration and are reviewed by the Secretary of the Navy for approval or denial.

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

A. Response Burden:

(1) DD Form 2168

Total annual respondents:	2,700
Frequency of response	1
Total annual responses	2,700
Burden per response	30 minutes
Total burden hours:	81,000 minutes/60 = 1,350 hours

B. Labor Cost to Respondents

Average labor cost \$32.13 per hour per respondent for an annual total of \$86,751.

C. Explanation of How Burden is Estimated: The estimate of response burden is based on experience in completing applications of this length.

13. Estimates of Cost Burden for the Respondent for Collection of Information

A. Total Capital and Start-up Costs

There are no capital and start-up costs associated with this information collection.

B. Operation and Maintenance Costs

(1) Supporting Documentation and Copying

5 pages at \$.12 per page = \$.60

2700 applications x \$.60 = \$1,620.00

TOTAL ANNUAL O&M COST: \$1,620.00

14. Estimates of Costs to the Federal Government

1) Admin review and processing – 15 min \$5.85
GS-9 Personnel Administrator
Hourly rate of \$23.39

Cost per form = \$5.85 x 2,700 forms \$15,759.00

2) Printing

Stock on hand for those not having access to DoD
Forms Website.

Cost per 2,700 forms: \$158.40

3) Mailing

Cost per mailing one form = \$.41 x 2,700 forms \$1,107.00

4) Final Review of Advisory Board

Five members x \$67/hour x 24 hours = \$8,040.00

Total cost to the government for 2,700 forms \$25,100.40

15. Changes in Burden

The change in burden for this information collection is due to a decline in the number of respondents applications over the past three years.

16. Publication Plans/Time Schedule

The results of collection of this information will not be published.

17. Approval Not to Display Expiration Date

The agency will display the expiration date.

18. Exceptions to the Certification Statement

There are no exceptions to the Certification Statement.

B. COLLECTION OF INFORMATION EMPLOYING STATISTICAL METHODS

This information collection does not employ statistical methods.