

SUPPORTING STATEMENT
Forms Relating to Military Service Records
(NA Forms 13036, 13042, 13055, and 13075)
OMB Control No. 3095-0039

1. **Circumstances Making the Collection of Information Necessary.** The National Personnel Records Center (NPRC) of the National Archives and Records Administration (NARA) administers military personnel and medical records of veterans after discharge, retirement, and death. Personnel records of military members who were discharged, retired, or died in service 62 or more years ago have been transferred to the legal custody of NARA and are referred to as “archival” records. Personnel records of military member who were discharged, retired, or died in service less than 62 years ago remain in the legal custody of the creating service and are administered in accordance with rules issued by the Department of Defense (DOD) and the Department of Homeland Security (DHS, Coast Guard). These records are hereafter referred to as “non-archival” records. In addition, NPRC administers the medical records of dependents of service personnel. When veterans, dependents, and other authorized individuals request information from or copies of documents in military personnel, military medical, and dependent medical records, they must provide on forms, in letters or online certain information about the veteran and the nature of the request. Federal agencies, military departments, veterans, veterans organizations, and the general public use Standard Forms (SF) 180, Request Pertaining to Military Records, in order to obtain information from military personnel service records stored at NPRC. Veterans or their next-of-kin also may submit requests online using eVetRecs. The authority for this information collection is contained in 36 CFR 1228.164.

A major fire at the NPRC on July 12, 1973, destroyed numerous military records. If individuals’ requests involve records or information from records that may have been lost in the fire, requesters may be asked to complete NA Form 13075, Questionnaire about Military Service, or NA Form 13055, Request for Information Needed to Reconstruct Medical Data, so that NPRC staff can search alternative sources to reconstruct the requested information.

Requesters who ask for medical records of dependents of service personnel and hospitalization records of military personnel may be asked to complete NA Form 13042, Request for Information Needed to Locate Medical Records, so that NPRC staff can locate the desired records.

Certain types of information contained in military personnel and medical records are restricted from disclosure unless the veteran provides a more specific release authorization than is normally required. Veterans are asked to complete NA Form 13036, Authorization for Release of Military Medical Patient Records, to authorize release to a third party of a restricted type of information found in the desired record.

In February 2010, NARA submitted OMB 83-C, Change Worksheet, for NA 13042, Request for Information Needed to Locate Medical Records. Due to a facility move, the address needed to be updated on the form. Another slight change was to the wording on the last sentence on page 2, item a. This change was to clarify the need for requester's to provide 'proof of death' when requesting documents on a deceased veteran and to emphasize the need for legal guardians to furnish copies of the court order proving guardianship.

2. **Purpose and Use of the Information.** Although military non-archival personnel and medical records described above are in NRPC's physical custody, legal custody of the records remains with the Department of Defense, the Department of Homeland Security, or the creating agency. Handling of requests for information from the records must conform to the legal requirements of the Freedom of Information Act (FOIA), the Privacy Act, and the implementing regulations of DOD and DHS, Coast Guard. NRPC uses information submitted on NA Forms 13036, 13042, 13055, and 13075 in order to locate requested records and to determine the releasability of records under DOD/DHS, Coast Guard rules. When third parties submit requests, this information collection serves as a record of disclosure since military non-archival service records are covered by the Privacy Act. Without the information collection, NRPC would be unable to provide requested information to requesters since information submitted in the information collection is the minimum NRPC staff need in order to locate and release requested records.
3. **Use of Information Technology and Burden Reduction.** With the use of information technology NRPC has made NA Forms 13036, 13042, 13055 and 13075 available online at the locations listed below. At this time, however, no information technology application is available to accept the collected information online. The collected information is the minimum information needed to allow NRPC to locate the record and provide the requested information. Also, minimum usage of any one form makes compliance with GPEA requirements unfeasible.

Web addresses:

(13036) <http://www.archives.gov/st-louis/military-personnel/public/medical-records-veterans-access.html>
(13042) <http://www.archives.gov/st-louis/civilian-personnel/public-services.html> & <http://www.archives.gov/st-louis/military-personnel/other-medical-records.html>
(13055 & 13075) <http://www.archives.gov/st-louis/military-personnel/alternate-record-sources.html>

4. **Efforts to Identify Duplication and Use of Similar Information.** There is no duplication.
5. **Impact on Small Businesses or Other Small Entities.** NRPC has minimized the burden on small businesses and other small entities by accepting requests directly from individuals who are verifying their military service for employment with small businesses/entities or for other

purposes. NRPC also accepts requests from small businesses/small entities in the format of the requester's choosing.

6. **Consequences of Collecting the Information Less Frequently.** The frequency of response is on occasion, such as when individuals, businesses, and government agencies desire to acquire information from military personnel and medical records. Therefore, the information collection cannot be conducted less frequently because requesters determine when they want to request information. Many requesters submit one request in order to obtain replacements of documents in military service files or to verify some aspects of an individual's military service. Some requesters who conduct genealogical research may submit multiple requests, although NRPC has estimated that such individuals comprise no more than 3% of the total number of requesters.
7. **Special Circumstances Relating to the Guidelines of 5 CFR 1320.5.** This information collection will be conducted in a manner consistent with 5 CFR 1320.5.
8. **Comments in Response to the Federal Register Notice and Efforts to Consult Outside Agency.** No formal consultations have taken place. NARA published a notice in the *Federal Register* on 03/11/2008 (73 FR 13019 and 13020) requesting public comment. No comments were received. A second notice was published in the *Federal Register* on 05/28/2008 (73 FR 30645 and 30646) when this information collection was submitted to OMB for clearance.
9. **Explanation of Any Payment or Gift to Respondents.** This information collection involves no remuneration to respondents.
10. **Assurance of Confidentiality Provided to Respondents.** NRPC staff retains, in military personnel and medical files, in dependent medical files, and in NRPC's Case Management and Reporting System (CMRS) NA Forms 13036, 13042, 13055, and 13075 as Privacy Act-protected records of disclosure. NA Forms 13036, 13042, 13055, and 13075 become releasable only in accordance with Privacy Act provisions, contained in 5 U.S.C. 552a, and the routine uses for systems of military personnel records, contained in the Privacy Act system notice.
11. **Justification for Sensitive Questions.** Respondents are asked no questions of a sensitive nature.
12. **Estimates of Hour Burden Including Annualized Hourly Costs.** The hour burden for all individual respondents is as follows:

<i>Form of Request from Respondents</i>	<i>Number of Respondents</i>	<i>Responses per Respondent</i>	<i>Minutes per Response</i>	<i>Annual Hour Burden</i>

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NA Form 13036	1,300	1	5	108
NA Form 13042	8,500	1	5	708
NA Form 13055	20,000	1	5	1,667
NA Form 13075	50,000	1	5	4,167
TOTAL	79,800	--	--	6,650

NPRC developed the respondent data by observing the percentage of forms sent by NPRC for requesters to complete and return. The estimated times for each form of inquiry are based on the expectation that most respondents will be veterans/dependents who can complete required information from memory. Even the next of kin or others acting on authority of veterans/dependents are usually prepared to complete the essential information just as quickly. NPRC has found that most respondents leave blank those entries on forms for which the information is not readily known rather than research the information. NPRC staff has made such observations of visitors to NPRC who are considered to be typical of individuals who submit their requests by mail.

13. **Estimate of Other Total Annual Cost Burden to Respondents or Recordkeepers.** The estimated annualized cost for individual respondents is \$0.91. The total estimated annualized respondent cost is \$72,618. These costs are based on NPRC's estimate that respondents who submit the NA Forms 13036, 13042, 13055, and 13075 will take 5 minutes to complete a form. Because requests are normally made for the personal benefit of requesters, the cost of a respondent's time is established at the minimum wage rate of \$5.85 per hour. The remainder of each respondent cost consists of costs for envelopes (\$.01) and postage (\$.41).

<i>Form of Request from Respondents</i>	<i>Number of Respondents</i>	<i>Minutes per Response</i>	<i>Respondent Cost</i>	<i>Annualized Cost for Hour Burden</i>
NA Form 13036	1,300	5	\$0.91	\$1,180
NA Form 13042	8,500	5	\$0.91	\$7,714
NA Form 13055	20,000	5	\$0.91	\$18,150
NA Form 13075	50,000	5	\$0.91	\$45,375
TOTAL	79,800	--	\$0.91	\$72,618

14. **Annualized Cost to the Federal Government.** The total estimated annualized cost to NARA is \$3958. This cost consists of the estimated annualized costs for desktop printing of NA Forms 13036, 13042, 13055, and 13075. However, no cost is assigned to the staff time required to perform core functions at NRPC, including: responding to letter and forms requests that contain sufficient information; and reviewing and preparing the responses for mailing.
15. **Explanation for Program Changes or Adjustments.** There is no change to the previous Annual Hour Burden. There is an increase in both the Annualized Cost for Hour Burden and the Annualized Cost to the Federal Government of 9.6% and 11% respectively. This is attributed to a higher minimum raise, postal costs and higher costs for printing supplies.
16. **Plans for Tabulation and Publication and Project Time Schedule.** The information collection is not used for statistical studies or publications.
17. **Reason(s) Display of OMB Expiration Date is Inappropriate.** The expiration date of the OMB approval will be displayed on the forms.
18. **Exceptions to Certification for Paperwork Reduction Act Submissions.** NARA is not requesting any exceptions to the certification statement identified in Item 19, “Certification for Paperwork Reduction Submissions,” of OMB Form 83-I.