

## **SUPPORTING STATEMENT**

### **Application for Identification Card/DEERS Enrollment**

#### **A. JUSTIFICATION**

##### **1. Need for Information Collection**

This information collection is consistent with Department of Defense (DoD) guidelines that have been outlined in DoD Directive 1000.25 (Tab 1) which directs DoD ID cards be issued from an authoritative database, using authoritative information and DoD Instruction 1000.13 (Tab 2) which outlines the requirements for issuance of DoD ID cards to DoD personnel and their eligible dependents.

This information collection is needed to obtain the necessary data to establish eligibility for DoD benefits, including the issuance of a DoD ID card.

##### **2. Use of the Information**

This information shall be used to establish an individual's affiliation with DoD, in support of the issuance of a DoD ID card. Once this information has been collected and proofed to the standard requisite in Federal Information Processing Standards 201-1 [for Common Access Card applicants (CAC)] (Tab 3), and according to the DoD Instruction 1000.13 [for all other DoD ID card applicants], to establish an individual's identity, a DEERS record will be established that shall allow for the issuance of the appropriate ID card. The information that is collected 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 all eligible DoD personnel and their dependents which can include: members of the uniformed services, civilian employees (e.g., DoD civilian employees, DoD contractor personnel), foreign nationals, and their eligible dependents.

##### **3. Improved Information Technology**

Consistent with DoD Directive 1000.25, the Real-time Automated Personnel Identification System (RAPIDS) is the system that facilitates the collection of the information on the DD Form 1172-2 (Tab 4), links the data collected to the central DEERS database, and produces the DoD ID cards in an authoritative manner. This system limits the opportunity for error for data entries for those pre-enrolled in DEERS and requires the respondent, when pre-enrolled, to update only changed information.

Additionally, the Director DHRA released the memorandum, "DEERS/RAPIDS Lockdown for Additional Populations" on November 5, 2010 (Tab 5) designating additional

populations to be enrolled securely into DEERS, via an automated data feed [Contractor Verification System (CVS)]. This eliminates the requirement to use the manual version of this form [DD Form 1172-2] for most of the CAC eligible population. Individuals that cannot be entered via CVS, or another automated data feed to DEERS, will use the manual version of the 1172-2 for the issuance of a DoD ID card; these populations may include dependents of DoD sponsors and foreign national employees.

#### **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. Furthermore, eligible DoD beneficiaries would not be able to have an appropriate way of identifying themselves in order to receive the benefits in which they are entitled.

#### **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**

The notice appeared on September 30, 2010 , Volume 75, pages 60415-60416 (Tab 6).

No comments were received.

This information collection was reviewed and approved by the following:

OSD (P&R)	Ms. Jeanne Douglas	703-695-4491
OSD/WHS	Ms. Glynda Hughes	703-696-5283
WHS/ESD	Ms. Cindy Allard	703-588-6830
USA	Mr. Terrance Henry	703-325-0202
USN	Mr. Linden Butler	901-874-3467
USAF	Ms. Karen Bennett	210-565-2689
USMC	Mrs. Mary Stroz	703-784-9529
USCG	CWO Dave Washburn	202-475-5393

NOAA	Ms. Neavely Edoja	301-713-3453
PHS	Ms. Mary Boone	240-453-6038

## 9. Payments to Respondents

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

## 10. Assurance of Confidentiality

The information is collected and stored in the DEERS database. Database users access the system through biometric validation and PKE logon which safeguards 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 is 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.

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

### A. Response Burden:

#### (1) DD Form 1172-2

Total annual respondents: 5,000,000  
Frequency of response: Once every three years, or as required  
Total annual responses: 5,000,000  
Burden per response: 4 minutes  
Total burden hours: 20,000,000 minutes/60 = 333,333 hours

B. Explanation of How Burden was Estimated. The burden of 4 minutes was estimated by observation of the process (average renewal time + average new enrollment time)

### C. Labor Cost to Respondent:

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

(low grade employees) 2,500,000 respondents x \$3.07  
(medium grade employees) 1,500,000 x = \$3.32  
(high grade employees) 1,000,000 x = \$8.22

Total = \$20,875,000

### **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 2 million forms (other 3 million are electronically processed) at \$.044 per form equals \$88,000.

Personnel specialists entering information, reviewing, and processing the form are military personnel (average military pay grade E-4 [hourly pay \$14.20]) or federal civilian employees (average grade GS-4/step 5 [hourly pay \$10.40]). The average hourly wage of the military personnel and civilian employees is \$12.30. 333,333 hours (5 million respondents times 4 minutes for data entry divided by 60) times \$12.30 equals,

Total cost to the Government = \$4,187,996 (includes cost of printing)

### **15. Changes in Burden**

Increase in burden is based on the consolidation of DD Form 1172-2 and the 1172.

### **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.