

Supporting Statement Outline

SUPPORTING STATEMENT – PART A

A. JUSTIFICATION

1. Need for the Information Collection

In accordance with Title 10 U.S.C. Section 1408, state courts may divide military pay as property or order alimony and child support payments from that retired pay. The former spouse may apply to the Defense Finance and Accounting Service (DFAS) for direct payments of these monies by using the DD Form 2293. This information collection is needed to provide DFAS the basic data needed to process the request.

2. Use of the Information

The respondents to this information collection are spouses or former spouses (herein referred to as applicant) of military members. The applicant submits to DFAS a DD Form 2293, "Application for Former Spouse Payments from Retired Pay". The information from the DD Form 2293 is used by DFAS to process the applicant's request as authorized under Title 10 U.S.C. Section 1408. The DD Form 2293 was devised to standardize applications for payment under the Act. Information on the form is also used to determine the applicant's current status and contains the statutory required certifications the applicant/former spouse must make when applying for payments.

3. Use of Information Technology

The use of information technology has been considered, but is not appropriate for purposes of this collection at this time. Individuals do not always have access to technology and the form requires certification for legal purposes.

4. Non-duplication

Investigation resulted in no findings of duplication of reporting or records. The DD Form 2293 is used by DFAS which is the only agency charged with enforcement of this law. No similar information or verification procedures currently exist that can be used for this information collection.

5. Burden on Small Business

This collection of information does not have a significant impact on small businesses or other entities.

6. Less Frequent Collection

There is no other method for less frequent collection. The form is only collected once, when the applicant initially applies.

7. Paperwork Reduction Act Guidelines

There are no special circumstances that would require this collection to be conducted in a manner inconsistent with 5 CFR 1320.5(d)(2).

8. . Consultation and Public Comments

- a. The 60-day Federal Register notice for this collection of information was published on February 7, 2012 (77 FR 6091). No Comments were received.
- b. The DFAS Privacy and Records Management Officers coordinated on the collection.

9. Gifts or Payment

No payment or gift will be provided to respondents, other than payments paid as entitlements resulting from certification requirements.

10. Confidentiality

Respondents are assured confidentiality via the Privacy Act Statement on the form. DFAS certifies that the information collected is maintained in accordance with the Privacy Act of 1974, and OMB Circular A-130, Management of Federal Information Resources. Disclosure of the Social Security Number (SSN) is used for positive identification of the individual requesting payments. The information collected is covered under the Defense Finance and Accounting Service Privacy Act System of Records Notice Number T7347b, Defense Military Retiree and Annuity Pay System. The PIA is located at:

<http://www.dfas.mil/foia/privacyimpactassessments.html>

11. Sensitive Questions

Questions of a sensitive nature such as those pertaining to sexual behavior and attitudes, or religious beliefs are not asked of the respondents.

12. Respondent Burden, and its Labor Costs

a. Estimation of Respondent Burden:

Number of Respondents	29,127
Responses per Respondent	1
Time Required per Response	15 minutes
Total Burden Hour	7,282 hours

b. Labor Cost of Respondent Burden

Number of Respondents	29,127
Responses per Respondent	1
Time Required per Response	15 minutes
Avg Labor Cost per Response (GS-9, step 5 \$22.57 x .25 = \$5.64)	
Total Burden Costs	\$164,276.28

13. Respondent Costs Other Than Burden Hour Costs

There are no additional costs, such as start-up or capital costs, to the respondents.

14. Cost to the Federal Government

Estimates of Cost to the Federal Government.

Mailing decisional documents to applicants:	
29,127 x \$.44 (postage) per decision	= \$12,816
29,127 x \$.05 (envelope) per applicant	= \$ <u>1,456</u>
TOTAL MAILING COST:	\$14,272

Labor Costs. The following estimate involving labor costs is based on the personnel structure at the DFAS Cleveland Garnishment Operations, who have responsibility for reviewing applications for direct former spouse payments under the Act. Additionally, the hours of burden are based on the average hourly rate of \$22.57 for a GS-9, Step 5 and \$38.92 for a GS-13, Step 5, as published in the Federal Civil Service 2013 Pay Structure.

Paralegal Staff:	
GS-9, Step 5 paralegal x 1 hr x \$22.57 =	\$22.57
Team Attorney:	
GS-13, Step 5 x (15 minutes per cases) \$38.92/hr	<u>\$ 9.73</u>
TOTAL LABOR COST PER CASE	\$32.30

Total Estimated Cost to Federal Government:	
Mailing	\$ 14,272
Labor (29,127 respondents x \$32.30 per case)	<u>\$ 940,802</u>
TOTAL COST TO FEDERAL GOVERNMENT	\$ 955,074

15. Reasons for Change in Burden

This is a reinstatement with change of a previously approved collection. Total burden hours have increased from 6,722 to 7,282 based on increased number of respondents.

16. Publication of Results

The information collected will not be published or tabulated.

17. Non-Display of OMB Expiration Date

Approval is not sought to avoid display of the expiration date for OMB approval of the information collection.

18. Exceptions to "Certification for Paperwork Reduction Submissions"

There are no exceptions to the certification statement.