

## **SUPPORTING STATEMENT**

### **OMB 0704-0415, 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 (DoDD) 1000.25, "DoD Personnel Identity Protection (PIP) Program," which directs DoD identification (ID) cards be issued from an authoritative database, using authoritative information, DoD Instruction (DoDI) 1000.13, "Identification (ID) Cards for Members of the Uniformed Services, Their Dependents, and Other Eligible Individuals," which outlines the requirements for issuance of DoD ID cards to DoD personnel and their eligible dependents and prescribes the benefits to DoD personnel and their eligible dependents," and Directive-type Memorandum 08-003, "Next Generation Common Access Card (CAC) Implementation Guidance," which outlines the requirements for CAC issuance to DoD personnel and other eligible individuals.

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 DoD ID card issuance and benefits access. Once this information has been collected and proofed to the standard requisite in Federal Information Processing Standards 201-2, "Personal Identity Verification (PIV) of Federal Employees and Contractors" (for CAC applicants), and according to the DoD Instruction (DoDI) 1000.13, "Identification (ID) Cards for Members of the Uniformed Services, Their Dependents, and Other Eligible Individuals" (for all other DoD ID card applicants), a record will be established in the Defense Enrollment Eligibility Reporting System (DEERS) 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 eligible dependents, which can include: current, former, and retired uniformed services members, civilian employees (e.g., DoD civilian employees, DoD contractor personnel), foreign nationals, and eligible dependents.

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

Consistent with DoDD 1000.25, the Real-time Automated Personnel Identification System (RAPIDS) facilitates the collection of the information on the DD Form 1172-2,

“Application for Identification Card/DEERS Enrollment,” links the data collected to DEERS, and produces 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 October 29, 2010, designating additional populations to be enrolled securely into DEERS via an automated data feed provided by the Trusted Associate Sponsorship System (TASS), formerly the Contractor Verification System. This eliminates the requirement to use the manual version of the DD Form 1172-2 for contractors and eligible non-DoD civilian personnel. Individuals who cannot be entered via TASS, or another system providing an automated data feed to DEERS, will use the manual version of the DD Form 1172-2 for DEERS enrollment and ID card issuance; these populations may include dependents of DoD sponsors and foreign affiliates.

#### **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 holders who are authorized access to DoD facilities and systems. If collection were less frequent, eligible employees who are not already in DEERS would not be able to use computer systems and support provided would suffer. Furthermore, eligible DoD beneficiaries would not have an appropriate way of identifying themselves in order to receive the benefits to 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 60-day Federal Register notice announcing this information collection, as required by 5 CFR 1320.9(d), was published in Volume 78, No. 161, August 20, 2013, page 51171. No comments were received.

The Defense Manpower Data Center (DMDC) coordinated and administered testing and observation to 100 users at 10 ID card issuing facilities. The users were asked to complete the

form and provide any comments and/or suggestions. The users responded that the form was logical and clear in several areas. Some of the suggestions were incorporated into the form.

## **9. Payments to Respondents**

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

## **10. Assurance of Confidentiality**

Personal and personnel data information is securely collected, stored, and managed in DEERS in accordance with the DEERS System of Records Notice (SORN). The DEERS SORN, DMDC 02 DoD, is available at: <http://dpclo.defense.gov/privacy/SORNS/component/osd/DMDC02.html>. The DEERS Privacy Impact Assessment (PIA) is available at: <https://www.dmdc.osd.mil/appj/dwp/getLinks.do?category=qkTx&tab=0&clOn=qk>. DEERS users access the system through biometric validation and PKE logon which restricts 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 by related DoD issuances.

## **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.

In accordance with the requirement established in DoDI 1000.30, "Reduction of Social Security Number (SSN) Use Within DoD," the memorandum justifies the collection and continued use of the SSN on the DD Form 1172-2.

The SSN that is collected on the DD Form 1172-2 is used in documented and published computer matching agreements to verify an individual's eligibility for benefits from other Federal agencies (e.g., Social Security Administration and Department of Veteran Affairs.) The collection of SSN allows the DoD to minimize the risk of providing benefits to those that are not eligible and helps minimize fraudulent claims. The DD Form 1172-2 is also used to issue the CAC as required by Homeland Security Presidential Directive 12. The SSN is used in conjunction with other approved documentation to affirmatively establish the identity that the CAC represents. These requirements are consistent with the guidance for acceptable uses of the SSN as specified in DoDI 1000.30.

In support of the Department's SSN reduction plan, the DD Form 1172-2 only requires the collection of SSN for initial DEERS enrollment. After initial DEERS enrollment, an individual will be assigned a unique DoD ID number which the individual may use in lieu of the SSN when repopulating the DD Form 1172-2 for future updates. The SSN, along with other personnel data information, is securely collected, stored, and managed in accordance with the DEERS SORN.

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

- A. Response Burden. The total burden response for the DD Form 1172-2 is 135,000 hours, and is calculated in the following manner:

Total annual respondents	2,700,000
Frequency of response	Once every three years, or as required
Total annual responses	2,700,000
Burden per response	3 minutes
Total burden minutes:	8,100,000 minutes/60 = 135,000 hours

The total annual respondents and total annual responses have been recalculated 5,000,000 to 2,700,000, as shown in the table below, to reflect accurate counts. The new counts are the result of technical enhancements to DEERS which enable DMDC to scan and save this collection when it is submitted and then to run a report of the number of scans during a specific time period. In September 2013, DoD began enrolling same-sex spouses of uniformed service members, eligible civilian employees, and other eligible individuals in accordance with DoD policy. This new population has been included in the number of respondents and responses.

ITEM	CURRENT RECORD (2011)	NEW RECORD (2013)
Respondents	5,000,000	2,700,000
Total Annual Responses	5,000,000	2,700,000
Percentage Electronic	95%	95%
Total Annual Hours	333,333	135,000
Adjustment	N/A	-198,333

- B. Explanation of How Burden was Estimated. The burden of 3 minutes was estimated by observation of the process.
- C. Labor Cost to Respondent. The labor cost to the respondent for the DD Form 1172-2 is \$8,684,000, and is calculated in the following manner:

<u>Respondent Grade</u>	<u>Labor Cost of DD Form 1172-2</u>	<u>Labor Cost</u>
Low grade employees (Average hourly rate: \$45.90)	1,300,000 respondents x \$2.30 =	\$2,990,000
Medium grade employees (Average hourly rate: \$49.80)	800,000 x \$2.49 =	\$1,992,000
High grade employees (Average hourly rate: \$123.30)	600,000 x \$6.17 =	\$3,702,000
Total Labor Cost		\$8,684,000

### 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 approximately 135,000 forms (other 2,565,000 are electronically processed) at \$.044 per form equals \$5,940. The total cost to the Federal Government is \$1,112,940, including printing and personnel labor costs. The estimated burden to the Federal Government for processing each form is 2 minutes, based on observation of the process during internal testing. The annual burden hours and the total cost to the Federal Government were calculated in the following manner:

Total Annual Responses:	2,700,000
Frequency of response:	Once every three years, or as required
Burden per response:	2 minutes
Total annual burden hours:	5,400,000 minutes/60 = 90,000 hours

<u>Personnel</u>	<u>Average Pay Grade</u>	<u>Estimated Cost</u>	<u>Labor Cost</u>
Military Personnel	E4 / hourly pay \$14.20	45,000 hours x \$14.20	\$639,000
Civilian Employee	GS-4 step 5 / hourly pay \$10.40	45,000 hours x \$10.40	\$468,000
Total Cost to Federal Government			\$1,107,000

#### 15. Changes in Burden

- A. The total annual respondents and total annual responses have been recalculated 5,000,000 to 2,700,000, as shown in Section 12, to reflect accurate counts. The new counts are the result of technical enhancements to DEERS and TASS which enable the Department to scan and save this collection when it is submitted and then to run a report of the number of scans during a specific time period.
- B. The collection instrument has been updated to:
- (1) Include a permission box to use email address for benefits notification in block 16;
  - (2) Add a section to capture Verifying Official (VO) name, Site ID, telephone number, and signature;
  - (3) Add blocks to capture a dependent's (aged 18 and over) primary email address and a permission box to use email address for benefits notification;
  - (4) Add blocks to capture a dependent's telephone number; and,
  - (5) Agency Disclosure Notice – burden adjusted.

**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.