

## SUPPORTING STATEMENT

OMB No. 0730-0014, *Dependency Statements (DD 137-3 – DD 137-7)*

### A. JUSTIFICATION

#### 1. Need for the Information

This information collection allows the Government to determine the degree of financial support a military member provides a dependent and, if adequate, authorizes the benefits. Pursuant to 37 U.S.C. 401, 403, 406 and 10 U.S.C. 1072 and 1076 the member must provide at least one-half of claimed dependents' monthly expenses. The DoDFMR 7000.14, Volume 7A defines the definition of dependent, directs the requirement to prove in fact dependency, and also prescribes the forms to be used. To prevent abuse of these benefits, and to comply with the above cited statutes, the information requested is needed to substantiate the receipt of the benefit.

#### 2. Use of the Information

DD Form 137-3, Dependency Statement – Parent, DD Form 137-4, Dependency Statement – Child Born Out of Wedlock, DD Form 137-5, Dependency Statement – Incapacitated Child Over Age 21, DD Form 137-6, Dependency Statement – Full-Time Student 21-22 Years of Age, and DD Form 137-7, Dependency Statement – Ward of a Court are submitted by members to apply for benefits. They must complete the appropriate “Dependency Statement.” Dependency claims the degree of financial support a member provides a dependent and, if adequate, authorizes the benefits. Without this information, it would be uncertain if an entitlement to a benefit exists. This collection of information decreases the possibility of monetary allowances and Uniformed Services Identification (USIP) card benefits being approved on behalf of ineligible dependents. The requirement to complete these forms helps alleviate the opportunity for fraud, waste, and abuse of dependent benefits. The DD Form 137-3, “Dependency Statement – Parent,” is submitted by the member to claim a parent, parent-in-law, stepparent, in-loco-parentis, or parent by adoption for monetary allowance and or a USIP card. The DD Form 137-4, “Dependency Statement – Child Born Out of Wedlock Under Age 21,” is submitted to claim a child born out of wedlock for a USIP card. The DD Form 137-5, “Dependency Statement – Incapacitated Child Over Age 21,” is submitted to claim an incapacitated child over age 21 for monetary allowances or a USIP card. The DD Form 137-6, “Dependency Statement – Full Time Student 21-22 Years of Age,” is submitted to claim a student for monetary allowances. The DD Form 137-7, “Dependency Statement – Ward of a Court,” is submitted to claim a minor designated as a Ward of a Court for monetary allowance.

#### 3. Use of Information Technology

The DD 137 series forms are available in fillable PDF format versions from the DoD Forms Repository on the World Wide Web. Respondents may complete the form online and print and mail the completed form for processing. The Department of Defense requires a witnessed signature and hard copy certification of these documents. Thus,

currently, there is no effective way to apply information technology to this collection process.

#### 4. Non-duplication

Investigation resulted in no findings of duplication of reporting or records. 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

Financial information and living arrangements change frequently; therefore, new dependency statements must be completed on a regular basis. Current requirement is annually and members are advised of the responsibility to re-accomplish as the need arises rather than on an annual basis. Less frequent collection of information could result in ineligible members receiving benefits.

#### 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 Comments

The Federal Register notice for this collection of information was published on June 11, 2013, Volume 78, No. 112 No public comments were received.

#### 9. Gifts or Payments

No payments or gifts will be provided to respondents, other than payment paid as benefits resulting from meeting eligibility requirements.

#### 10. Confidentiality

The "Routine Uses" section of the Privacy Act Statement indicates who may be furnished information as required by the Privacy Act. The Privacy Act Statement was also updated to include links to the below referenced SORNs. The Defense Finance and Accounting Service (DFAS) certifies that the information collection is maintained in accordance with the Privacy Act of 1974; OMB Circular A-130, Management of Federal Information Resources; and FIRMR Bulletin B-1 and is covered under DFAS Privacy Act System of Records Notice:

T7340, Defense Joint Military Service – Active Component at <http://dpclo.defense.gov/Privacy/SORNsIndex/DODwideSORNArticleView/tabid/6797/Article/6277/t7340.aspx>;

T7344, Defense Joint Military Service – Reserve Component at <http://dpclo.defense.gov/Privacy/SORNsIndex/DODwideSORNArticleView/tabid/6797/Article/6281/t7344.aspx>;

T7347b, Retired and Annuitant Pay at <http://dpclo.defense.gov/Privacy/SORNsIndex/DODwideSORNArticleView/tabid/6797/Article/6282/t7347b.aspx>;

M01040-3 – Marine Corps Total Forces System at <http://dpclo.defense.gov/Privacy/SORNsIndex/DODwideSORNArticleView/tabid/6797/Article/6774/m01040-3.aspx>.

The SSN and other identifying information for the member and dependents are needed to pay the proper person, ensure entitlement to pay, and for tax purposes. Without the SSN, identifying information, payments for BAH with dependents could not be processed.

The Privacy Act Assessment (PIA) for DJMS-AC, DJMS-RC, and DRAS can be found at: <http://www.dfas.mil/foia/privacyimpactassessments.html>

The PIA for MCTFS can be found at: <http://www.doncio.navy.mil/ContentView.aspx?ID=678>

#### 11. Sensitive Questions

No sensitive questions are asked of the respondents.

#### 12. Respondent Burden, and its Labor Costs

##### a. Estimation of Respondent Burden:

Number of Respondents	15,766
Responses per Respondent	1.33
Annual Responses:	20,969
Time Required per Response	50 minutes
Total Burden Hour	17,474 hours

##### b. Labor Cost of Respondent Burden:

Cost to each respondent involves approximately 50 minutes of time for completion of each form. Based on a GS-8/5 hourly wage of \$20.64 = \$360,663.36.

13. Respondent Costs Other Than Burden Hour Costs

There are no capital or start-up costs associated with this information collection. Postage is negligible and a notary public is available at no charge to military personnel through their legal offices.

14. Cost to the Federal Government

The estimated annualized cost to the Federal Government associated with collecting this information is \$360,663.36. Based on GS-8, Step 5 as published in the Federal Civil Service 2014 Pay Structure (\$20.64 x 17,474 hours = \$360,663.36).

Printing	20,969 forms per yr. @ \$0.10	=	\$ 2,096.90
Mailing	20,969 forms per yr. @ \$0.49	=	<u>10,274.81</u>
			\$12,371.71

TOTAL: \$373,035.07

15. Reasons for change in Burden

Burden has decreased due to a decrease in eligible dependents. This number fluctuates with member needs. The only change on the form was an update on the Privacy Act Statement to include the links to SORNs referenced in Section 10 above.

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 submissions”

There are no exceptions to the certification statement identified in Item 19 of the OMB Form 83-I.