SUPPORTING STATEMENT – PART A

A. JUSTIFICATION

1. Need for the Information Collection

The Ike Skelton National Defense Authorization Act for Fiscal Year 2011 (FY11), Section 702, aligns TRICARE Program eligibility by providing a means to extend the age of eligibility of TRICARE dependents from age 21 or 23 up to age 26 to allow the purchase of extended dependent medical coverage across existing TRICARE program options (Standard, Extra, and Prime). This is consistent with the intent of the Patient Protection and Affordable Care Act, the implementing Health and Human Services regulations, and the limitations of Chapter 55 of Title 10. Section 702 allows qualified adult children not eligible for medical coverage at age 21 (23 if enrolled in a full-time course of study at an institution of higher learning approved by the Secretary of Defense) and are under age 26 to qualify to purchase medical coverage unless the dependent is enrolled in or eligible to purchase employer sponsored insurance per section 5000A(f)(2) of the Internal Revenue Code of 1986 or is married. The dependents shall be able to purchase either the TRICARE Prime or Standard/Extra benefits depending meeting specific program requirements and the availability of a desired plan in their geographic location.

2. Use of the Information

DD Form 2947, TRICARE Young Adult Application, is used by former dependents to apply for, change, or terminate their TRICARE Young Adult coverage or to request a different Primary Care Manager (PCM).

Information gathered through this collection is used by the regional managed care support contractors to process the applications to start, change, or terminate TRICARE Young Adult coverage or to request a different PCM.

3. <u>Use of Information Technology</u>

Adult age dependents can obtain an electronic version of the application form via the TRICARE.mil website. When they identify their geographical location via their residential ZIP code, they will be presented with an application form that contains the contact information for the correct regional contractor responsible for processing the application. They can either complete the form online, or download an electronic portable data format (.pdf) file to a computer to be completed, then print, sign, and then submit the hardcopy application for processing.

The form may also be accessed via the Beneficiary Web Enrollment (BWE) website at https://www.dmdc.osd.mil/appj/bwe/indexAction.do. They can either complete and submit the application form online, or they can complete the form online and then print the form and submit it in hardcopy after signing the application.

4. Non-duplication

This collection is not duplicative. Collection of this information is necessary to complete the purchase of TRICARE Young Adult coverage.

5. Burden on Small Business

This collection of information does not involve small businesses or other small entities.

6. <u>Less Frequent Collection</u>

Collection of information is necessary upon the initial application to purchase coverage, when a change in coverage is requested, upon request to terminate coverage, or to request in change in PCM. Reducing the collection of information to less frequently would result in beneficiaries not having any coverage at all or maintaining coverage when they no longer desire it.

7. Paperwork Reduction Act Guidelines

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

8. Consultation and Public Comments

- a. Public comments were solicited via a 60-day notice published on February 2, 2015, Vol. 80, No. 21, Page 5520). No comments were received.
- b. Feedback was solicited from representatives from the Air Force, Navy, and Army Surgeons General offices as well as representatives from each of the servicing TRICARE managed care support contractors. Each provided input to improve the readability and ease of use of the form.

9. Gifts or Payment

No gifts or payments will be provided to respondents.

10. Confidentiality

DD Form 2947 contains a section at the top of page one regarding the Privacy Act Statement. The entity with whom DoD has contracted to perform enrollment functions is contractually required to keep information private to the extent permitted by law.

The applicable System of Record Notice (SORN) is DHA-07, Military Health Information System, located at: http://dpcld.defense.gov/Privacy/SORNsIndex/DODwideSORNArticleView/tabid/6797/Article/570690/dmdc-02-dod.aspx

Paper records are closed out at the end of the calendar year in which finalized and held six additional years and then destroyed. Where hard copy records have been converted to electronic, microfilm, imaging, or optical formats, the hard copy record is destroyed and the electronic, microfilm, imaging, or optical format is kept by the contractor for six years.

11. Sensitive Questions

The form requests the applicant provide a personal identifier number, which may be either than the individual's social security number (SSN) or the DoD Benefit Number (DBN). The DBN has yet to be widely used and known by beneficiaries for healthcare transactions. Additionally, the main data source to find the DBN is the Uniformed Services identification card (ID card). Since the applicants are former dependent children, they either never had access to their DBN on an ID card in the first place or no longer have access to their DBN when they turned in their ID card after aging out of military benefits. For these reasons, DHA has justified the continued use of the SSN until such time the DBN is readily known by beneficiaries through repeated use and through means of knowing the DBN from documents other than the ID card.

12. Respondent Burden, and its Labor Costs

a. Estimation of Respondent Burden

The total annual burden hours for respondents are 8,000 hours. It is based on a projection of 16,000 adult age dependents submitting applications on average twice a year to start, change, or terminate their TRICARE Young Adult coverage. The burden is based on an estimate of 15 minutes (.25 hours) to complete the application.

b. <u>Labor Cost of Respondent Burden</u>

The current federal minimum wage is \$7.25 per hour. The labor cost of 8,000 hours of respondent burden is \$58,000.

13. Respondent Costs Other Than Burden Hour Costs

a. Total capital and start-up costs.

There are no capital or start-up costs annualized over the expected useful life of the form by the respondent.

b. Total operation and maintenance costs.

There are no operation and maintenance costs by the respondent.

14. Cost to the Federal Government

The Department of Defense contracts with the current regional managed care support contractors to process the completed applications. If requested, a paper version of the form will be provided

by the regional contractors to an adult age dependent. Those costs are already included in the overall administrative costs for each current contract. It costs the Government approximately \$7 to process each of the 32,000 expected TRICARE Young Adult application forms. The total cost to the government will be \$224,000.

15. Reasons for Change in Burden

No change in burden.

16. Publication of Results

There are no plans to publish or tabulate the information collected.

17. Non-Display of OMB Expiration Date

We are not seeking approval to not display the expiration date for OMB approval of the information collection

18. Exceptions to "Certification for Paperwork Reduction Submissions"

No exception to the Certification Statement is requested.