

SUPPORTING STATEMENT - PART A

Exchange Employee Travel Files (0702-XXXX)

A. JUSTIFICATION

1. Need for the Information Collection

The Army and Air Force Exchange Service (Exchange) is a Non-Appropriated Fund (NAF) Instrumentality of the United States of America. Army Regulation 215-8/Air Force Instruction 34-211(I) charges the Army and Air Force Exchange Service with the dual and enduring mission of providing quality merchandise and services to its customers at competitively low prices and of generating earnings which provide a dividend to support family, morale, welfare and recreation (FMWR) programs.

This information collection is required to process all official Continental United States (CONUS) and Outside the Continental United States (OCONUS) Exchange Permanent Change of Station (PCS) requests for Exchange employees and their dependents/family members. The data collected assists the Exchange Human Resources (HR) Travel personnel in determining eligibility of the employee and/or dependents to travel, obtain passports and visas and authorizing any travel expense reimbursement.

This collection is authorized by Title 10 U.S.C. §3013, "Secretary of the Army;" Title 10 U.S.C. §8013, "Secretary of the Air Force;" Army Regulation 215-8/AFI 34-211(I), "Army and Air Force Exchange Service Operations;" and Executive Order 9397 (SSN), as amended.

2. Use of the Information

When an eligible Exchange employee has been selected for an official PCS or a newly hired employee is being assigned or relocated to their official Exchange duty location, information is provided to the Exchange Travel Directorate. The information collected is used to officially approve the move and assist the employee and family members/dependents (if applicable) with relocation of their household goods.

Once the Exchange employee has been selected for an official PCS or a new hire has been chosen for relocation, the employee contacts Human Resources (HR). HR directs the employee to the Exchange internal secured portal. The internal secure portal has several forms for employees who are relocating: Relocation Request for CONUS to Overseas, Cartus Services Request, Household Goods Request, Overseas to CONUS – PCS Request, and Relocation Request for Overseas to Overseas.

Depending on the type of relocation and the requirements thereof, the employee will fill out one or more application/request for official PCS orders.

These applications/requests provide the following information; The employee's full name, last five numbers of his/her social security number, current pay grade level, current duty station, new duty station, home address, home phone number, work number, cell number, and personal e-mail address. If the employee's dependents are relocating, the following data is collected: the full name of the dependent, a yes or no question as to whether the dependent will depart at the same time as the employee, the dependent's relationship to the employee (i.e. spouse, son or daughter), and the dependent's date of birth.

The employee chooses a preferred method of travel: air, drive, bus, train, etc. The Exchange assists the employee with their travel and addresses the need for visas/passports and the transfer of his/her personal household goods including his/her personal vehicle. If needed, information relative to the vehicle is provided; the make, model, year and Vehicle Information Number (VIN) number.

Other information collected from the employee includes date of birth, actual place of residence, and the employee's emergency contact information which includes the contact's name and phone number.

Exchange Forms 1500-014 and 1500-032 are available to the HR Travel Technician on the Exchange internal electronic forms system. The HR Travel Technician completes Form 1500-014 "Authorization for Permanent Change of Station (PCS) Travel," using the information provided by the employee on the application/request forms. Should events determine a need to change the dates of travel or the designation of travel, the HR Technician will complete, on behalf of the employee, Form 1500-032 "Request and Authorization for Change of Travel." This form identifies the employee by name, grade and last 5 digits of his/her social security number along with the order approved on Exchange Form 1500-014. The form also identifies the traveling employee's dependents by name. Both the Exchange Form 1500-014 and 1500-032 are the official orders that are provided to the employee, which includes dependent information if applicable, in order to execute all travel related actions/requirements.

The HR Technician then verifies the accuracy of all information and forwards the printed orders to the appropriate management authority for approval and signature. The electronic input is not saved. Once approved, the signed order is scanned by the technician and placed on the travel directorate's protected server. Hard copies of these forms are maintained in a secured area within the travel directorate and the original is provided to the traveler.

3. Use of Information Technology

An Exchange HR associate poses questions to the traveling employee through a secured portal via a request form for PCS travel. 100% of answers are captured electronically. The use of technology allows the Exchange Travel team to readily assist an employee, while traveling to their duty station. Information is readily accessible to authorized persons upon emergencies during travel.

Three individuals in the travel directorate collect and maintain this information. Other individuals may have a need to know, such as Human Resource Associates who may review the documents upon proper request from the traveler, the Office of General Counsel for legal review/requirements, or Force Protection/Loss Prevention for security purposes.

The electronic data allows immediate access for inquiries or updates relative to correspondence with financial institutions, Internal Revenue Service, and/or places of employment for verification of an employee's place of duty. It is also used to provide travel reimbursements or to address insurance claims relative to the move of goods. The SSN collection is used to obtain data for these purposes and used by contracted moving organizations and foreign countries to identify the individual. The SSN may also be used for taxpayer information.

The employee only needs to supply information once. The travel documents are readily available for disclosure to the employee or their designee upon their request pursuant to the Privacy Act of 1974, as amended, *Title 5 U.S.C. §552a*.

4. Non-Duplication

This specific information is not available from other sources as it is collected only at the time of applying for travel.

5. Burden on Small Business

The collection of information does not have an impact on small businesses or other entities.

6. Less Frequent Collection

Information is collected when an active Exchange employee submits information to the Exchange travel team for Exchange's business operation needs. Submission is done "as needed" or "on occasion". Less frequent collection is not possible.

7. Paperwork Reduction Act Guidelines

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

8. Consultation and Public Comments

a. A notice of the proposed collection was published in the Federal Register on March 19, 2015, 80 FRN 14368. No comments were received. A notice of submission for OMB review was published in the Federal Register on November 27, 2015, 80 FRN 74091.

b. Significant input and information was received from the Exchange Travel team located in the Exchange Human Resource Directorate. It is determined that information is only maintained in one database and used in accordance with Section 2 of this statement.

c. A consequence of this input resulted in the elimination of two forms from this submission that were previously identified in the 60-Day Federal Register Notice cited above: Exchange Form 1500-013 "Request and Authorization for TDY Travel" and Form 1500-042 "Official Travel Request." Our consultations determined that these two forms do not collect information relative to dependents, contractors, or any other members of the public. The information collected from these forms is restricted to active Exchange employees, and used for the purpose of approving and providing transportation for business purposes, i.e. meetings, training, or business conferences. Therefore, these forms were eliminated from this submission. Furthermore, this resulted in a significant decrease in the number of public respondents and a corresponding reduction in annual burden hours, from 1,200 respondents and 2,700 burden hours to 350 respondents and 263 burden hours.

9. Gifts or Payment

There are no gifts or payment associated with the collection of this information.

10. Confidentiality

Personal data information is securely collected, stored and managed in accordance with the draft copy of the Exchange System of Records Notice (SORN) AAFES 0410.01, entitled "Exchange Employee Travel Files". Employees providing information are informed verbally that the information they choose to provide is voluntary on their part but that deletion of information may disqualify them from traveling. The traveling employee is also informed of the routine uses of disclosure at the time of submitting their personal information. After the forms are scanned, they are maintained in the appropriate files, and the employee obtains a copy of the Official PCS orders, as well as, an additional written Privacy Act Statement.

Information collected is protected under the Privacy Act of 1974, as amended. Access to the information collected is restricted: Physical entry is restricted by the use of locks, guards, and is accessible only to authorized personnel; Access to records is limited to person(s) with an official "need to know," who are responsible for servicing the record in performance of their official duties; Persons are properly screened and cleared

for access; and Access to computerized data is role-based and further restricted by passwords, which are changed periodically. In addition, integrity of automated data is ensured by internal audit procedures, database access accounting reports and controls to preclude unauthorized disclosure.

Disclosure of respondent information is made upon submission of the individuals' original, notarized, written request for documents either disclosed to themselves or to a third party representative. Records may be disclosed outside of DoD pursuant to Title 5 U.S.C. §552a(b)(3) regarding DoD "Blanket Routine Uses" published at <http://dpcl.d.defense.gov/Privacy/SORNsIndex/BlanketRoutineUses.aspx>. This may include disclosures to the attaché or law enforcement authorities of foreign countries, the U.S. Department of Justice or Department of Defense legal/intelligence/investigative agencies for security, investigative, intelligence, and/or counterintelligence operations. These disclosures are consistent with the System of Records Notice (SORN) available for view at <http://dpcl.d.defense.gov/Privacy/SORNsIndex/DODwideSORNArticleView/tabid/6797/Article/570125/aafes-041001.aspx>. I have provided a draft copy of the altered SORN.

The enclosed Privacy Impact Assessment (PIA) was completed by the Exchange in July 2013 in reference to this electronic collection of information. This PIA is in association with the Exchange APMS Portfolio located in the DoD Information System, Register (DITPR) Number 15980 (DA 301730) "Exchange-Human Resource Management" and may be viewed at <http://ciog6.army.mil/Portals/1/PIA/2013/EXHRM-TMG.pdf>. The enclosed draft PIA was prepared and is being reviewed for publishing.

All Exchange forms are currently being reviewed for update by our forms manager to include the Agency Disclosure Notice, Privacy Act Statement (PAS) and basic instructions. In the interim, The Exchange will provide the Agency Disclosure Notice, Privacy Act Statement (PAS) and instructions as a separate coversheet or via e-mail to all respondents to read prior to completing the application/request form.

Electronic Permanent Change of Station (PCS) files are maintained in a locked down facility in the Exchange HR travel directorate. These files are erased from the secured electronic storage system eight (8) years after the employee's travel date. Paper copies of the PCS orders are destroyed by shredding.

11. Sensitive Questions

Respondents may be asked to provide social security number (SSN) and date of birth. In some situations such as traveling to foreign countries, collected information may include, sex, national origin, and geographic features. Collection of social security number is authorized under DoDI 1000.30 "SSN Instruction Use Case" Enclosure 2 sections 2.c.(3) and (9) as stated in the attached SSN collection memoranda.

12. Respondent Burden, and its Labor Costs

a. Estimation of Respondent Burden

The average annual burden estimate for reporting and recordkeeping requirements were derived from estimates from the Human Resource directorate based upon the history of obtaining travel documents. Our previous 60 Day Federal Register Notice, as identified in item 8a, provided an estimated number of all travelers and not specific to this particular collection. After consulting again with the Exchange travel directorate, we have estimated that approximately 350 individual PCS during a year. Each traveler (respondent) takes an estimated 45 minutes (.75/Hour) of time to submit information to the Exchange travel team.

- Number of Annual Respondents = 350
- Number of Annual Responses per Respondent = 1
- Number of Annual Responses = 350
- Response Time = 45 minutes
- Information Frequency = On Occasion
- Total Respondent Burden Hours = 263

b. Labor Cost of Respondent Burden

Each respondent is estimated to spend approximately 45 minutes of time providing information. Using the United States Department of Labor Wage and Hour Division's Federal Minimum wage of \$7.25/hour (July 24, 2009), it is estimated the annual total labor cost to respondents is \$1,904.

- Number of Annual Respondents = 350
- Number of Responses per Respondent = 1
- Number of Annual Responses = 350
- Response Time = 45 Minutes
- Avg. Labor Cost per Response based upon current minimum wage = \$5.44
- Information Frequency = On Occasion
- Total Respondent Labor Cost = \$1,904

13. Respondent Costs Other Than Burden Hour Costs

There are no capital or start-up costs associated with this collection.

14. Cost to the Federal Government

The Exchange utilizes 3 HR associates who share the responsibility of collection and maintenance of PCS data. These associates have an average salary of \$30.00 per hour. (NAF Wage Schedule – 152 Dallas, TX Effective 04 Jan 2014.) We have estimated an approximately 45 minutes of time to collect the required information.

- 3 – Number of personnel who dedicate time to collecting/processing information collected from the respondent. (Only one employee per response)

- 350 = Number of annual responses.
- 45 minutes (.75) = Time in hours per response to collect/process the information collected; including time for refining, interpreting, analyzing and documenting the information received.
- \$30.00 = Average salary of the individuals who collect and process the information collected.
- \$22.50 = Average cost per response.
- 263 (Burden Hours) x 30.00 (Hourly Pay) x .75 (Time to Respond) = \$5,918 (Annual burden cost).

This is an existing system of records. Start-up costs cannot be estimated. Maintenance to this system includes an average salary of IT System Support Team, the burden cost to the Exchange, and the overhead to maintain such database. The maintenance fee was determined from consultations with the Exchange IT/LP team who manage the system.

- Annual cost to the federal government:
\$5,918 (Burden) + \$42,026 (Maintenance Time) + \$4,000 (Maintenance of System, estimated) = \$51,944 (NAF Wage Schedule – 152 Dallas, TX Effective 04 Jan 2014.)

15. Reasons for Change in Burden

This is an existing collection in use without an OMB control number.

16. Publication of Results

There are no plans to publish the results of this collection.

17. Non-Display of OMB Expiration Date

There is no request for approval to omit the display of the expiration date of the OMB approval on the instrument.

18. Exceptions to “Certification for Paperwork reduction Submissions”

There are no exceptions.