

SUPPORTING STATEMENT – PART A

TRICARE Retiree Dental Program (TRDP) – 0720-0015

A. JUSTIFICATION

1. Need for the Information Collection

This form is used by retired and family members of retired Service Members applying for dental coverage under the TRICARE Retiree Dental Program (TRDP). There is also an online application, but due to the age of the population covered under the TRDP, and resistance to electronic formats, there also needs to be a written application form. Authority is found in 10 U.S.C. 1076c Dental Insurance Plan: Certain Retirees and Their Surviving Spouses and Other Dependents.

2. Use of the Information

The collection of this information is required to verify the eligibility of those interested in voluntary enrollment into the TRDP. The TRDP is offered by the Department of Defense through the Defense Health Agency. The TRDP offers a voluntary group benefits program of comprehensive, cost-effective dental coverage for retired members of the Uniformed Services and their family members, un-remarried surviving spouses and children of deceased members, and other select individuals.

3. Use of Information Technology

Eligible beneficiaries may enroll in one of two methods. First, through a hardcopy enrollment form; or second, via a web based Beneficiary Web Enrollment (BWE) system offered by the Defense Eligibility and Enrollment Reporting System (DEERS) operated by the Defense Manpower Data Center (DMDC). Approximately 76% of beneficiaries enroll through BWE.

4. Non-duplication

Members may enroll through BWE or by mailing a hardcopy application to the contractor. The same information is requested through either method, but members enrolling only need to complete one method to enroll. Many of our members prefer not to transmit information over the internet, so a hardcopy application must be available.

5. Burden on Small Business

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

6. Less Frequent Collection

Enrollment is open throughout the year and becomes effective on the first of the month following processing of the enrollment application. Collection is continuous in order to maintain open enrollment. Enrolling members only need to enroll once, but collection is open continuously as there is no restriction on when eligible members may enroll. The TRDP is authorized by 10 U.S.C.1076c and 32 CFR 199.22 which authorizes enrollment in the TRDP and provide for policy to be set by the Department of Defense. Such policy includes open enrollment on a continuous basis, and access to full benefits if a member enrolls within 120 days of retirement. Less frequent opportunities to enroll will violate the Departments policy and intent to allow ongoing enrollment.

7. Paperwork Reduction Act Guidelines

This collection of information is consistent with the guidelines in 5 CFR 1320.5(d) (2).

8. Consultation and Public Comments

a. A 60-day notice was published in the Federal Register on June 22, 2015 (80 FR 35637-35638). No comments were received. A 30-day notice was published in the Federal Register on April 25, 2016 (81 FR 24069-24070).

b. The solicitation of input occurred as a result of beneficiary engagement when completing the enrollment form. Delta Dental has been using the Defense Manpower Data Center (DMDC) BWE capability since January 2014 as part of their new TRDP contract.'

9. Gifts or Payment

No payment or gifts will be provided to the respondents.

10. Confidentiality

The TRDP enrollment form contains a Privacy Act Statement one page one. 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 Records Notice (SORN) ID Number is EDHA 07, Military Health Information System.

<http://dpclid.defense.gov/Privacy/SORNsIndex/DODwideSORNArticleView/tabid/6797/Article/570672/edha-07.asp>

11. Sensitive Questions

PII collected through the TRDP Application is used by the TRDP contractor to determine, through DEERS, the applicant's eligibility to participate in the TRDP and, if eligible,

to register the applicant and any designated family members, into the TRDP. The TRDP Application also provides the TRDP contractor the information necessary to establish an electronic payment method to provide for TRDP premium payments if the applicant's retired pay is insufficient to pay the TRDP premiums.

The Acceptable Use Case applicable to the TRDP Application are found in Paragraph 2.c.(4), Interactions with Financial Institutions, and Paragraph 2.c.(11), Legacy System Interface of DoDI 1000.30.

Acceptable Use Case 2.c(4) permits SSN collection where it may be necessary to have an individual's SSN "for systems, processes, or forms that interface with or act on behalf of individuals or organizations in transactions with financial institutions." Financial institutions with which electronic payment methods are established may request the applicant's SSN or last four SSN digits to validate the establishment of an electronic payment method on behalf of the applicant.

12. Respondent Burden, and its Labor Costs

a. Estimation of Respondent Burden

Estimation of Respondent Burden Hours					
	Number of Respondents	Number of Responses per Respondent	Number of Total Annual Responses	Response Time (Amount of time needed to complete the collection instrument)	Respondent Burden Hours (Total Annual Responses multiplied by Response Time) Please compute these into hours)
Collection Instrument	60,000	1	60,000	.25 hours	15,000

The estimated total annual burden hours for respondents are 15,000 hours. The burden is based on an estimated 60,000 enrollment applications with a response time of 15 minutes (.25 hours) per response.

$$60,000 \text{ respondents/responses} \times .25 = 15,000 \text{ burden hours.}$$

b. Labor Cost of Respondent Burden

Labor Cost of Respondent Burden					
	Number of Responses	Response Time per Response	Respondent Hourly Wage	Labor Burden per Response (Response Time multiplied by Respondent Hourly Wage)	Total Labor Burden (Number of Respondents multiplied by Response Time multiplied by Respondent Hourly Wage)
Collection Instrument	60,000	0.25 hours	\$25	\$6.25	\$375,000

Based on an average wage of \$25/hour, and a response time of 15 minutes per response, the labor cost of respondent burden is \$6.25. ($\$6.25 \times 60,000$ respondents = \$375,000)

13. Respondent Costs Other Than Burden Hour Costs

Additional costs to the eligible population for completing a hardcopy form include postage costs to mail the form to Delta Dental of California. These costs are approximately \$7,056.00 based on 60,000 total enrollments, of which 24% will be hardcopy. ($14,400 \times \$0.49 = \$7,056.00$)

14. Cost to the Federal Government

	Collection Instrument #1	Collection Instrument #2	Total
Number of Responses	45,600	14,400	60,000
Processing Time Per Response (in hours)	1 minute	0	1 minute
Hourly Wage of Worker(s) Processing Responses	Machine processing time only	0	n/a
Cost to Process Each Response (Processing Time Per Response)	.05 cents	0	.05 cents

multiplied by Hourly Wage of Worker(s) Processing Responses)						
Total Cost to Process Responses (Cost to Process Each Response multiplied by Number of Responses	2, 280.00	0	2, 280.00			
Operational and Maintenance Costs						
Equipment	Printing	Postage	Software Purchases	Licensing Costs	Other	Total
n/a	n/a	n/a	n/a	n/a	n/a	n/a

Total Cost to the Federal Government		
Operational and Maintenance Costs	Labor Cost to the Federal Government	Total Cost (O&M Costs + Labor Cost)
	2,280.00	2,280.00

The Department of Defense contracts with Delta Dental of California to provide dental insurance services to the eligible population of retired Service members and their families. Enrollment into the program is required in order to receive services. Enrollment is accomplished through either BWE or via a hardcopy enrollment form, completed by the sponsor and mailed to Delta Dental to complete enrollment. Costs for processing the enrollment applications are borne entirely by Delta Dental. Costs for BWE are borne by DMDC. The government has attempted to carve out the costs of eligible beneficiaries using BWE (as a pass through to Delta Dental). That includes BWE machine processing costs roughly estimated at \$2,200 per year i.e., $60,000 \times 76\% = 45,600 \times .05 = \$2,200$. The Delta Dental contract is wholly paid through premiums collected from enrolled beneficiaries, with no Government cost sharing, meaning there is no Government cost relative to hardcopy enrollments. All enrollments received in hardcopy are processed by the contractor. The Government has no roll in receiving or processing hardcopy enrollments.

15. Reasons for Change in Burden

This is a reinstatement of a previously approved collection for which OMB approval has expired. There is a decrease in burden due to a decrease in the number of responses.

16. Publication of Results

There is no plan to publish or tabulate the information collected in an independent report. Data will be used for enrollment in the TRDP only.

17. Non-Display of OMB Expiration Date

Approval not to display the expiration date is not being sought.

18. Exceptions to "Certification for Paperwork Reduction Submissions"

No exception to the Certification Statement is requested.