

SUPPORTING STATEMENT – PART A

Application for Trusteeship – OMB No. 0730-0013

JUSTIFICATION

1. Need for the Information Collection

According to 37 USC, Chapter 11, Section 602, “Pay and Allowances of the Uniformed Services – Payments to Mentally Incompetent Persons,” the Department of Defense has the authority to provide entitlement benefits. Department of Defense (DoD) Financial Management Regulation (FMR) 7000.14, Volume 7A, Chapter 33, “Certifying Officers, Departmental Accountable Officials, and Review Officials,” DoDFMR 7000.14, Volume 7B, Paragraph 160204, “Physical or Mental Incapacitation,” states that “all applications to appoint a trustee and related documentation should be submitted to Defense Finance and Accounting Service (DFAS), Retired Pay Department, P.O. Box 998021, Room 1579, Cleveland, OH 44199-8021. While next-of-kin or other relative of the retiree ordinarily is preferred for designation as trustee unless a committee, guardian, or other legal representative is appointed by a court of competent jurisdiction. If more than one qualified person applies to be named as trustee for mentally incompetent retiree, the DFAS designee shall determine which applicant is a more appropriate trustee.”

2. Use of the Information

DD Form 2827 is used by DFAS to determine the proper entitlement of an incompetent services members and retirees. When member is determined to be mentally incompetent by medical board or physician report, a relative, friend, or agency applying to be appointed trustee is either mailed the form to complete or accesses a fillable electronic version through the DoD Forms repository. DFAS reviews the completed form and assigns trustee. The approved DD 2827 is mailed to the new trustee. The appropriate payments are made to the trustee until the demise of the member or trustee, or evidence of the misuse of funds. If the form is not received with the completed certification, the retired payments are suspended until a trustee can be assigned through the successful submission of DD Form 2827.

The Privacy Act Statement and Agency Disclosure Notice are available to the respondent on the form.

3. Use of Information Technology

DD Form 2827 is generally sent by mail to the trustee, but is also available in fillable PDF format from the DoD Forms Repository. Respondents may complete the form online, print and mail the completed form for processing. Taking that into consideration, electronic technology use is approximately 20%. This has increased from 10% at last approval. At this time, further electronic submission is not possible due to the need for wet signatures for the legal

assignment of a trustee. However, there are future plans to readdress the process of mailing forms and instead direct 100% of respondents to the DoD Forms website.

4. Non-duplication

Investigation resulted in no findings of duplication of reporting of 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

If DFAS does not receive the information, retired payments are suspended. The requirement to complete the form ensures and helps alleviate the opportunity for fraud and abuse of member 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 Public Comments

- Part A: PUBLIC NOTICE

The 60-Day Federal Register Notice for this collection of information was published on October 9, 2015 (80 FRN 61185). No public comments were received. The 30-Day Federal Register Notice for this collection of information was published on October 26, 2016 (81 FRN 74412).

- Part B: CONSULTATION

At this time no consultation efforts have been completed.

9. Gifts or Payment

No payment or gift will be provided to respondents.

10. Confidentiality

Respondents are assured confidentiality, to the extent provided by law, via the Privacy Act Statement on the form. DFAS certifies that the information collected is maintained in accordance with the Privacy Act of 1974, and OMB Circular A-130, Management of Federal Information Resources.

The SORN covered by this system is T7347b, “Defense Military Retiree and Annuitant Pay System,” which can be viewed at:
<http://dpcl.d.defense.gov/Privacy/SORNsIndex/DOD-wide-SORN-Article-View/Article/570196/t7347b/>

The PIA that covers this system is “Defense Retired and Annuitant Pay System,” found at:
http://www.dfas.mil/dam/jcr:4c735dde-6b84-4f24-8153-bd83643c98b1/PIA_DRAS_2010.pdf.

The Records Retention reads as follows: “Disposition for Retired and Annuitant Pay records range from 30 days to 56 years. The administrative records such as, change of address, electronic messages or tax records that are not pay affecting, are destroyed using retention of 30 days to less than 6 years. All pay affecting documents such as retirement documents, account computation information or entitlement/eligibility records are retained for six years or more and the pay histories are retained for 56 years. Records are destroyed by tearing, shredding, pulping, macerating, burning, or degaussing the electronic storage media.”

Records retention for these forms is 6 years as stated in the DFAS 5015.2-M, Records Disposition Schedules (<https://dfas4dod.dfas.mil/library/pubs/rmp5015/dfas50152m-signpg.pdf>) under schedule 7347, rule 7.

11. Sensitive Questions

Disclosure of the Social Security Number (SSN) is used for positive identification due to the payment of a benefit. A justification memo is being submitted as part of the OMB submission package.

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)
DD 2827, Application for Trusteeship	75	1	75	.25 hour (15 minutes)	18.75
Total	75	1	75	.25 hour (15 minutes)	18.75

b. Labor Cost of Respondent Burden

Labor Cost of Respondent Burden					
	Number of Responses	Response Time per Response	Respondent Hourly Wage (Federal Minimum wage*)	Labor Burden per Response (Response Time multiplied by Respondent Hourly Wage)	Total Labor Burden (Number of Responses multiplied by Response Time multiplied by Respondent Hourly Wage)
DD 2827, Application for Trusteeship	75	.25 hour (15 minutes)	\$15.35	\$3.84	\$287.81

Total	75	.25 hour (15 minutes)	\$15.35	\$3.84	\$287.81
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*This wages statistic is provided by the Department of Labor, as found at <https://www.dol.gov/general/topic/wages/minimumwage>

13. Respondent Costs Other Than Burden Hour Costs

Postage costs for respondents is \$36.75 (75 respondents x \$.49).

There are no additional costs, such as start-up or capital costs, to the respondents.

14. Cost to the Federal Government

	DD 2827, Application for Trusteeship	Total
Number of Responses	75	75
Processing Time Per Response (in hours)	.083 hour (5 minutes)	.083 hour (5 minutes)
Hourly Wage of Worker(s) Processing Responses (Federal Civil Service 2016 Pay Structure*)	\$28.14	\$28.14
Cost to Process Each Response (Processing Time Per Response multiplied by Hourly Wage of Worker(s) Processing Responses)	\$2.34	\$2.34
Total Cost to Process Responses (Cost to Process Each Response multiplied by Number of Responses)	\$175.50	\$175.50

* This wage statistic is provided by the 2016 General Schedule (GS) Locality Pay Tables, 2016 General Schedule (Base), as found at <https://www.opm.gov/policy-data-oversight/pay-leave/salaries-wages/2016/general-schedule/>

Operational and Maintenance Costs						
Equipment	Printing	Postage	Software Purchases	Licensing Costs	Other	Total
\$0	\$4.50	\$36.75	\$0	\$0	\$0	\$41.25

Total Cost to the Federal Government		
Operational and Maintenance Costs	Labor Cost to the Federal Government	Total Cost (O&M Costs + Labor Cost)
\$41.25	\$175.50	\$216.75

15. Reasons for Change in Burden

This is a request for reinstatement of a previously approved collection, without change, for which approval is expired.

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 Reduction Submissions"

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