

## SUPPORTING STATEMENT – PART A

### OMB 0704-0415 - Application for Identification Card/DEERS Enrollment

#### A. JUSTIFICATION

##### 1. Need for the Information Collection

This information collection is consistent with Department of Defense (DoD) guidelines that have been outlined in DoD Instruction (DoDI) 1000.25, “DoD Personnel Identity Protection (PIP) Program,” which directs DoD identification (ID) cards be issued from an authoritative database, using authoritative information, DoDI 1000.13, “Identification (ID) Cards for Members of the Uniformed Services, Their Dependents, and Other Eligible Individuals,” which outlines the requirements for issuance of DoD ID cards to DoD personnel and their eligible dependents and prescribes the benefits to DoD personnel and their eligible dependents, and DoD Manual (DoDM) 1000.13 Volume 1, “DoD Identification (ID) Cards: ID Card Life-Cycle,” which outlines the requirements for CAC issuance to DoD personnel and other eligible individuals.

This information collection is needed to obtain the necessary data to establish eligibility for DoD benefits, including the issuance of a DoD ID card.

##### 2. Use of the Information

This information shall be used to establish an individual’s affiliation with DoD, in support of DoD ID card issuance and benefits access. Once this information has been collected and proofed to the standard requisite in Federal Information Processing Standards 201-2, “Personal Identity Verification (PIV) of Federal Employees and Contractors” (for CAC applicants), and according to DoDI 1000.13, “Identification (ID) Cards for Members of the Uniformed Services, Their Dependents, and Other Eligible Individuals” (for all other DoD ID card applicants), a record will be established in the Defense Enrollment Eligibility Reporting System (DEERS) that shall allow for the issuance of the appropriate ID card. The information that is collected may be released to Federal and State agencies and private entities, on matters relating to utilization review, professional quality assurance, program integrity, civil and criminal litigation, and access to Federal government facilities, computer systems, networks, and controlled areas.

The respondents included in this information collection are all incoming DoD contractor personnel and foreign nationals; and all eligible dependents of DoD personnel, including: current, former, and retired uniformed services members, DoD contractor personnel, and foreign nationals.

The DD Form 1172-2 is accessed by the respondent either online, <http://www.dtic.mil/whs/directives/forms/eforms/dd1172-2.pdf> or it is provided to them in person at an ID card site. The respondents return the collection in person at an ID card site to an individual responsible for the issuance of a DoD ID card. The appropriate disclosures are provided to the respondent via a Privacy Act Statement and Agency Disclosure Notice on the

instructions page of form. No invitations or other communications are sent to the respondent. Information is collection from respondents at their initial hiring or, in the case of dependents, eligibility. Information is also requested from respondents already enrolled in the DEERS system every three or four years to ensure that data is as up to date as possible. Finally, information may also be collected from enrolled respondents as needed, such as replacing a lost or stolen ID card.

Consistent with DoDI 1000.25, the Real-time Automated Personnel Identification System (RAPIDS) facilitates the collection of the information on the DD Form 1172-2, “Application for Identification Card/DEERS Enrollment,” links the data collected to DEERS, and produces DoD ID cards in an authoritative manner. This system limits the opportunity for error for data entries for those pre-enrolled in DEERS and requires the respondent, when pre-enrolled, to update only changed information. DEERS users access the system through biometric validation and PKE logon which restricts access to DEERS to authorized users only.

### 3. Use of Information Technology

14% of the 3,700,000 responses are submitted electronically, as the majority of forms are provided, completed, and submitted on-site at a DoD ID card site. Past approvals of this collection demonstrated higher rates of electronic collection — but current USD(P&R) staff can find no evidence that indicates these levels of electronic collection. The 14% electronic figure is taken directly from processing statistics that break down submissions by electronic and paper submission.

### 4. Non-duplication

No other government agency is responsible for this program. There is no other information collection which duplicates the information collected on this form.

### 5. Burden on Small Business

Collection of this information does not involve small entities.

### 6. Less Frequent Collection

If information collection were stopped, the DoD would not register and issue a PKI certificate to newly hired DoD employees or other eligible CAC holders who are authorized access to DoD facilities and systems. If collection were less frequent, eligible employees who are not already in DEERS would not be able to use computer systems and support provided would suffer. Furthermore, eligible DoD beneficiaries would not have an appropriate way of identifying themselves in order to receive the benefits to which they are entitled.

### 7. Paperwork Reduction Act Guidelines

There are no special circumstances associated with this data collection.

### 8. Consultation and Public Comments

## Part A: PUBLIC NOTICE

The 60-day Federal Register notice announcing this information collection, as required by 5 CFR 1320.9(d), was published in Volume 81, No.229, November 29, 2016, page 85939. No Comments were received.

The 30-day Federal Register notice announcing this information collection, as required by 5 CFR 1320.9(d), was published in Volume 82, No.18, January 30, 2017, page 8730. Since the date of publication, no comments have been received.

## Part B: CONSULTATION

The Defense Manpower Data Center (DMDC) coordinated and administered testing and observation to 100 users at 10 ID card issuing facilities. The users were asked to complete the form and provide any comments and/or suggestions. The users responded that the form was logical and clear.

### 9. Gifts or Payment

No payments will be made to respondents for completion of the DD Form 1172-2.

### 10. Confidentiality

Personal and personnel data information is securely collected, stored, and managed in DEERS in accordance with the DEERS System of Records Notice (SORN).

The DEERS SORN, DMDC 02 DoD, is available at:  
<http://dpcl.d.defense.gov/Privacy/SORNsIndex/DOD-Component-Article-View/Article/627618/dmdc-02-dod/>.

The DEERS Privacy Impact Assessment (PIA) is available at:  
[https://www.dmdc.osd.mil/appj/dwp/rest/download?fileName=DEERS\\_PIA.pdf&groupName=websiteDocuments](https://www.dmdc.osd.mil/appj/dwp/rest/download?fileName=DEERS_PIA.pdf&groupName=websiteDocuments) .

Respondents are asked to read the Privacy Act Statement, which is included on the instructions page of DD Form 1172-2, prior to filling out and signing the DD Form 1172-2. The Privacy Act Statement is up to date with a link to the latest version of the SORN.

The Records Retention and Disposition Schedule states the following:

“Hardcopy version of DD Form 1172: Destroy once written to optical disk.

Optical disks: Destroy primary and backup copies after 5 years.

The DEERS database is Permanent: Cut off (take a snapshot) at end of Fiscal Year and transfer to the National Archives and Record Administration in accordance with 36 CFR 1228.270 and 36 CFR 1234. (N1-330-03-01)

Output records (electronic or paper summary reports) are deleted or destroyed when no longer needed for operational purposes. Note: This disposition instruction applies only to record keeping copies of the reports retained by DMDC. The DoD office requiring creation of the report should maintain its record keeping copy in accordance with NARA approved disposition instructions for such reports.”

#### 11. Sensitive Questions

The gender of the individual is requested for demographic tracking purposes only. Gender is not a factor in the determination of eligibility.

In accordance with the requirement established in DoDI 1000.30, “Reduction of Social Security Number (SSN) Use Within DoD,” a memorandum justifying the collection and continued use of the SSN on the DD Form 1172-2 has been included with the materials submitted to OMB for this collection.

The SSN that is collected on the DD Form 1172-2 is used in documented and published computer matching agreements to verify an individual’s eligibility for benefits from other Federal agencies (e.g., Social Security Administration and Department of Veteran Affairs.) The collection of SSN allows the DoD to minimize the risk of providing benefits to those that are not eligible and helps minimize fraudulent claims. The DD Form 1172-2 is also used to issue the CAC as required by Homeland Security Presidential Directive 12. The SSN is used in conjunction with other approved documentation to affirmatively establish the identity that the CAC represents. These requirements are consistent with the guidance for acceptable uses of the SSN as specified in DoDI 1000.30.

In support of the Department’s SSN reduction plan, the DD Form 1172-2 only requires the collection of SSN for initial DEERS enrollment. After initial DEERS enrollment, an individual will be assigned a unique DoD ID number which the individual may use in lieu of the SSN when repopulating the DD Form 1172-2 for future updates. The SSN, along with other personnel data information, is securely collected, stored, and managed in accordance with the DEERS SORN.

#### 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 Form 1172-2	3,700,000	1	3,700,000	3 minutes	185,000 hours
Total	3,700,000	1	3,700,000	3 minutes	185,000 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 Responses multiplied by Response Time multiplied by Respondent Hourly Wage)
DD Form 1172-2	3,700,000	3 minutes	\$20.85	\$1.04	\$3,848,000
Total	3,700,000	3 minutes	\$20.85	\$1.04	\$3,848,000

The respondent hourly wage is the median usual weekly earnings of full-time wage and salary working men and women in the 3<sup>rd</sup> quarter of 2016 (\$834.00) divided by 40. The median usual weekly earnings of full-time wage and salary working men and women in the 3<sup>rd</sup> quarter of 2016 were provided by the Bureau of Labor Statistics at, <https://www.bls.gov/news.release/wkyeng.t01.htm>.

13. Respondent Costs Other Than Burden Hour Costs

There are no capital or start-up costs associated with this data collection. Respondents will not need to purchase equipment or services to respond to this information collection.

There are no operation or maintenance costs associated with this information collection.

14. Cost to the Federal Government

Printing approximately 3,200,000 forms (the other approximately 500,000 – roughly 14% – are electronically processed) at \$.044 per form equals \$140,800. The total cost to the Federal Government is \$2,175,800, including printing and personnel labor costs. The estimated burden to the Federal Government for processing each form is 2 minutes, based on observation of the process during internal testing. The annual burden hours and the total cost to the Federal Government were calculated in the following manner:

Total Annual Responses:	3,700,000
Frequency of response:	1
Burden per response:	2 minutes
Total annual burden hours:	7,400,000 minutes/60 = 123,333 hours

Labor Cost to the Federal Government		
	DD Form 1172-2	Total
Number of Responses	3,700,000	3,700,000
Processing Time Per Response (in hours)	1/30 <sup>th</sup> of an hour (2 minutes)	1/30 <sup>th</sup> of an hour (2 minutes)
Hourly Wage of Worker(s) Processing Responses	\$16.62	\$16.62

Cost to Process Each Response (Processing Time Per Response multiplied by Hourly Wage of Worker(s) Processing Responses)	\$0.55	\$0.55
Total Cost to Process Responses (Cost to Process Each Response multiplied by Number of Responses)	\$2,035,000	\$2,035,000

The hourly wage of worker(s) processing responses is the average salary of a customer service representative provided by the Bureau of Labor Statistics found at, <https://www.bls.gov/oes/current/oes434051.htm>.

Operational and Maintenance Costs						
Equipment	Printing	Postage	Software Purchases	Licensing Costs	Other	Total
\$0	\$140,800*	\$0	\$0	\$0	\$0	\$140,800

\*Cost of printing is for the 3,200,000 forms that are printed and provided in person, printed at \$0.044 per form. The remaining 500,000 forms are electronically processed.

Total Cost to the Federal Government		
Operational and Maintenance Costs	Labor Cost to the Federal Government	Total Cost (O&M Costs + Labor Cost)
\$140,800	\$2,035,000	\$2,175,800

15. Reasons for Change in Burden

The numbers of respondents, the hourly wage of respondents, the hourly wage of workers processing responses, and operational and maintenance costs have been updated to accurately reflect current data from this existing collection and an revised method of submission. The most significant changes are the additional one-million responses on average, and the preponderance of printed submissions, which are reflected in increased labor and printing costs. Due to greater accuracy in the hourly wage of respondents, the annual costs of this collection on the public have decreased even though the number of responses has increased.

16. Publication of Results

The results of collection of this information will not be published for statistical use.

17. Non-Display of OMB Expiration Date

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

18. Exceptions to "Certification for Paperwork Reduction Submissions"

No exceptions to the certification statement are being requested.