

## SUPPORTING STATEMENT - PART A

### Dependency Statements 0730-0014

#### 1. Need for the Information Collection

This information collection allows DFAS to determine the extent of support a member is providing to a dependent and that the dependent's income is less than 50% of their expenses, which authorizes the benefits. Pursuant to 5 U.S.C. 301, "Departmental Regulations," 37 U.S.C., "Pay and Allowances of the Uniformed Services," DoD Directive 5154.29, "DoD Pay and Allowances Policy and Procedures," Joint Travel Regulations (JTR), current edition, the member must provide at least one-half of claimed dependents' monthly expenses. The DoD Financial Management Regulation (FMR) 7000.14, Volume 7A, "Military Pay Policy - Active Duty and Reserve Pay," defines the definition of dependent, directs the requirement to prove in fact dependency, and also prescribes the forms to be used. To prevent abuse of these benefits, and to comply with the above cited statutes, the information requested is needed to substantiate the receipt of the benefit.

#### 2. Use of the Information

DD Form 137-3, Dependency Statement - Parent, DD Form 137-5, Dependency Statement - Incapacitated Child Over Age 21, DD Form 137-6, Dependency Statement - Full-Time Student 21-22 Years of Age, and DD Form 137-7, Dependency Statement - Ward of a Court are submitted by members to apply for benefits. In order for the member to receive benefits, the member must provide proof through the appropriate DD Forms that they are providing 50% or more of a dependent's support. The member must also provide additional documentation providing proof that the dependent's income is less than 50% of their living expenses. If the proper documents are not provided, it is uncertain if an entitlement to a benefit exists. The requirement to complete these forms alleviates the opportunity for fraud, waste, and abuse of dependent benefits.

DFAS reviews the Dependency Statements to determine if the member is eligible for benefit. Upon completion of the claim review process; the Claims Examiner either approves or disapproves the claim for benefits. If the claim is disapproved, the form, with all supporting documentation, is returned to the member with the reason that the claim was disapproved. If approved, the member is notified, and the benefits applied for begin.

The form is available on the DoD Forms website (<http://www.dtic.mil/whs/directives/forms/index.htm>), and can be returned through the askDFAS

submission portlet on dfas.mil ([https://www.dfas.mil/militarymembers/Secondary Dependency/SDC.html](https://www.dfas.mil/militarymembers/SecondaryDependency/SDC.html)), or through the U.S. mail to the address listed on the form. The Privacy Act Statement and Agency Disclosure Notice are available to the respondent on the form.

3. Use of Information Technology

80% are received electronically. Respondents may complete the form online, print and either mail the completed form and documentation for processing or submit the through the ask DFAS submission portlet on the dfas.mil website.

4. Non-duplication

The information obtained through this collection is unique and is not already available for use or adaptation from another cleared source.

5. Burden on Small Businesses

This information collection does not impose a significant economic impact on a substantial number of small businesses or entities.

6. Less Frequent Collection

Financial information and living arrangements change frequently; therefore, new dependency statements must be updated on an annual basis. When a qualified family event occurs, a new form must be submitted. Less frequent collection of information could result in ineligible members receiving benefits.

7. Paperwork Reduction Act Guidelines

This collection of information does not require collection to be conducted in a manner inconsistent with the guidelines delineated in 5 CFR 1320.5(d)(2).

8. Consultation and Public Comments

Part A: PUBLIC NOTICE

A 60-Day Federal Register Notice for the collection published on Friday, September 22, 2017. The 60-Day FRN citation is 82 FRN 44394.

A 30-Day Federal Register Notice for the collection published on Wednesday, December 27, 2017. The 30-Day FRN citation is 82 FRN 67217.

No comments were received during the 60-Day Comment Period.

## Part B: CONSULTATION

No additional consultation apart from soliciting public comments through the 60-day Federal Register Notice was conducted for this submission.

### 9. Gifts or Payment

No payments or gifts are being offered to respondents as an incentive to participate in the collection.

### 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.

SORN(s) covered by this system are:

T7340, Defense Joint Military Pay System – Active Component at:  
<http://dpcl.d.defense.gov/Privacy/SORNsIndex/DOD-wide-SORN-Article-View/Article/570191/t7340/>.

T7344, Defense Joint Military Pay System – Reserve Component at:  
<http://dpcl.d.defense.gov/Privacy/SORNsIndex/DOD-wide-SORN-Article-View/Article/570195/t7344/>.

T7347b, Defense Military Retired and Annuity Pay System Records at:  
<http://dpcl.d.defense.gov/Privacy/SORNsIndex/DOD-wide-SORN-Article-View/Article/570196/t7347b/>.

M01040-3, Marine Corps Manpower Management Information System at:  
<http://dpcl.d.defense.gov/Privacy/SORNsIndex/DOD-wide-SORN-Article-View/Article/570625/m01040-3/>.

PIA(s) covered by this system are:

T7340, Defense Joint Military Pay System – Active Component

T7344, Defense Joint Military Pay System – Reserve Component  
T7347b, Defense Military Retired and Annuitant Pay System Records

DFAS PIA(s) can be found at:

<https://www.dfas.mil/foia/privacyimpactassessments.html%20>.

M01040-3, Marine Corps Manpower Management Information System at:

[http://www.doncio.navy.mil/uploads/USMC\\_MCTIMS\\_PIA\\_summary\\_508.pdf](http://www.doncio.navy.mil/uploads/USMC_MCTIMS_PIA_summary_508.pdf).

Records Retention (T7340) – Records may be temporary in nature and destroyed when actions are completed, superseded, obsolete, or no longer needed. Other records may be cut off at the end of the payroll year or fiscal year, and destroyed 6 years and 3 months after cutoff. Active duty pay records created prior to automation were cut off on conversion to the Defense Joint Military Payroll System (DJMS), and will be destroyed October 1, 2033, or 56 years after implementation of DJMS. The records are destroyed by tearing, shredding, pulping, macerating, burnings, or degaussing the electronic storage media.

Records Retention (T7344) – Records may be temporary in nature and destroyed when actions are completed, superseded, obsolete, or no longer needed. Other records may be cut off at the end of the payroll year or fiscal year, and destroyed 6 years and 3 months after cutoff. Reserve pay records created prior to automation were cut off on conversion to the Joint Uniformed Military Payroll System (JUMPS), and will be destroyed 56 years after the year in which created. Records created after conversion to Defense Joint Military Pay System- Reserve Component (DJMS-RC) are cut off at end of payroll year and destroyed 56 years after year in which created. The records are destroyed by tearing, shredding, pulping, macerating, burnings, or degaussing the electronic storage media.

Records Retention (T7347b)- 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 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 6 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 (M01040-3) – Disposition pending (until the National Archives and Records Administration approves retention and disposal schedule, records will be treated as permanent).

## 11. Sensitive Questions

No questions considered sensitive are being asked in this collection.

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 137-3, Dependency Statement - Parent	8,992	1	8,992	1 hour	8,992 hours
DD 137-5, Dependency Statement - Incapacitated Child Over Age 21	1905	1	1905	45 minutes	1428.75 hours
DD 137-6, Dependency Statement - Full Time Student 21-22 Years of Age	616	1	616	30 minutes	308 hours
DD 137-7, Dependency Statement - Ward of a Court	3462	1	3462	1 hour	3462 hours
Total	14975	1	14975		14,190.75 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	Total Labor Burden (Number of

				Respondent Hourly Wage)	Responses multiplied by Response Time multiplied by Respondent Hourly Wage)
DD 137 -3, Dependency Statement-Parent	8992	1	\$21.53	1 hour	\$193,597.76
DD 137-5, Dependency Statement – Incapacitated Child Over Age 21	1905	1	\$21.53	45 minutes	\$30,760.99
DD 137-6, Dependency Statement – Full Time Student 21-22 Years of Age	616	1	\$21.53	30 minutes	\$6,631.24
DD 137-7, Dependency Statement – Ward of a Court	3462	1	\$21.53	1 hour	\$74,536.86
Total	14,975		\$21.53		\$305,526.85

\*The respondent wage was determined by using the 2017 Military Pay Chart (<https://www.dfas.mil/dam/jcr:0066b0ac-2d02-47a6-8b78-1cdc91b56ef7/2017MilitaryPayChart.pdf>)

## 12. Respondent Costs Other Than Burden Hour Costs

25% of the respondents (25% x 14,975 = 3744) currently mail the form and supporting documentation back through the US Post Office at an average cost of \$1.50 (3744 x \$1.50 = \$5616.00).

## 14. Cost to the Federal Government

a. Labor Cost to the Federal Government

	DD Form 137 series, Dependency Statements	Total
Number of Responses	14,975	14,975
Processing Time Per Response (in hours)	30 minutes	30 minutes
Hourly Wage of Worker(s) Processing Responses *	\$15.50	\$15.50
Cost to Process Each Response (Processing Time Per Response multiplied by Hourly Wage of Worker(s) Processing Responses)	\$7.75	\$7.75
Total Cost to Process Responses (Cost to Process Each Response multiplied by Number of Responses	\$116,056.25	\$116,056.25

\*Federal Civil Service 2017 Pay Structure ([https://www.opm.gov/policy-data-oversight/pay-leave/salaries-wages/salary-tables/pdf/2017/GS\\_h.pdf](https://www.opm.gov/policy-data-oversight/pay-leave/salaries-wages/salary-tables/pdf/2017/GS_h.pdf))

b. Operational and Maintenance Costs

Operational and Maintenance Costs						
Equipment	Printing*	Postage**	Software Purchases	Licensing Costs	Other	Total
	\$898.50	\$7337.75				\$8236.25

\*Printing (14,975 decision letters x \$.06 = \$898.50).

\*\*Postage (14,975 x \$.49 = \$7337.75).

Total Cost to the Federal Government		
Operational and Maintenance Costs	Labor Cost to the Federal Government	Total Cost (O&M Costs + Labor Cost)
\$8236.25	\$116,056.25	\$124,292.50

15. Reasons for Change in Burden

This is a reinstatement with change to an expired collection. Number of respondents was reevaluated and a better approach to identifying the numbers was used, causing a decrease in forms submitted.

16. Publication of Results

The results of this information collection will not be published.

17. Non-Display of OMB Expiration Date

We are not seeking approval to omit the display of the expiration date of the OMB approval on the collection instrument.

18. Exceptions to “Certification for Paperwork Reduction Submissions”

We are not requesting any exemptions to the provisions stated in 5 CFR 1320.9.