

SUPPORTING STATEMENT - PART A

Request for Information Regarding Deceased Debtor – 0730-0015

1. Need for the Information Collection

According to 31 U.S.C., Section 3111, “New Issue Used to Buy, Redeem, or Refund Outstanding Obligations,” Public Law 102-484, Section 614, “National Defense Authorization Act for Fiscal Year 1993,” Department of Defense (DoD) Financial Management Regulation (FMR) 7000.14, Volume 16, Chapter 3, “Collection of Debt Owed by Individuals to the Department of Defense,” actions must be taken to recover delinquent debts owed the DoD by individuals, including those who are no longer drawing salary or pay and allowances from the United States. This category of debtors includes former United States government civilian employees and former members of the Armed Forces. Indebted individuals may die before a debt due the DoD is fully collected. Should this occur, it may be possible to collect all or part of the indebtedness from the estate of the deceased.

2. Use of the Information

When a debtor passes, a family member notifies Defense Finance and Accounting Service (DFAS) by calling the Debt and Claims Customer Care Center, indicated on the debt notification letters, and submitting a death certificate by mail. Once DFAS receives the death certificate, a Customer Care Representative will annotate the debt record, suspend the debt, and complete the DD Form 2840, Request for Information Regarding Deceased Debtor, and submit to appropriate probate office to determine if there is an active estate. If a positive response is received from the probate office, DFAS will update the suspense and send an affidavit claim against the estate. If there is no response after 30 days, we take necessary action to write the debt off.

3. Use of Information Technology

0% electronic submissions are received. At this time, electronic submissions are not possible as pre-populated forms are sent to probate courts across the US requesting data. Respondents complete the form, sign and return for processing.

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

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

6. Less Frequent Collection

If DFAS does not collect this information, the final opportunity to collect delinquent individual indebtedness will be lost. There are no technical or legal obstacles to collecting indebtedness from estates.

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 Wednesday, October 11, 2017. The 60-Day FRN citation is 82 FRN 195.

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) associated with this collection:

T7332, Defense Debt Management System at:
<http://dpcl.d.defense.gov/Privacy/SORNsIndex/DOD-wide-SORN-Article-View/Article/570181/t7332/>

PIA(s) associated with this collection:

T7332, Defense Debt Management System at:
[https://www.dfas.mil/dam/jcr:d70231e9-3f82-4ed0-94a1-2eba345aea47/Defense%20Debt%20Management%20System%20and%20Debt%20and%20Claims%20Management_Oracle%20Policy%20Automation_Adope%20LiveCycle%20\(DDMS_DCM_OAP\).pdf](https://www.dfas.mil/dam/jcr:d70231e9-3f82-4ed0-94a1-2eba345aea47/Defense%20Debt%20Management%20System%20and%20Debt%20and%20Claims%20Management_Oracle%20Policy%20Automation_Adope%20LiveCycle%20(DDMS_DCM_OAP).pdf)

Records Retention: All cases will remain active until settled by full payment, waiver, write-off, or close out. The system contains records requiring a retention period of up to 10 years after final action. Records are retired to National Records Centers. Destruction is accomplished by tearing, shredding, pulping, macerating, or burning.

11. Sensitive Questions

Use of the SSN is necessary in order to obtain information from state probate courts or executors of the deceased members' estates concerning the establishment of an estate and to pursue collection of the indebtedness from the estate, as appropriate.

12. Respondent Burden and its Labor Costs

a. Estimation of Respondent Burden

DD 2840 Estimation of Respondent Burden Hours					
	Number of Respondents	Number of Responses per Respondent	Number of Total Annual Responses	Response Time	Respondent Burden Hours
DD Form 2840, Request for Information Regarding Deceased	150	1	150	.25 hour (15 minutes)	37.5 hours

Debtor – Family Member					
DD Form 2840, Request for Information Regarding Deceased Debtor – Probate Clerk	150	1	150	.083 hour (5 minutes)	12.5 hours
Total/ Average	300	1	300	Average of 10 minutes	50 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	Total Labor Burden
DD Form 2840, Request for Information Regarding Deceased Debtor (Family member reporting death)	150	.25 hour (15 minutes)	\$7.25	\$1.8125	\$271.875
DD Form 2840, Request for Information Regarding Deceased Debtor (Probate Clerk)	150	.083 hour (5 minutes)	\$17.63	\$1.46329	\$220.375
Total/ Average	300 total	Average of 10 minutes	Average of \$12.44	Average of \$1.64	\$492.25 total

The respondent (Family member reporting death) hourly wage was determined by using the Department of Labor Wage Website (<http://www.dol.gov/dol/topic/wages/index.htm>)

The respondent (Probate Clerk) hourly wage was determined by using the Bureau of Labor Statistics website, May 11, 2017 (<https://www.bls.gov/oes/current/oes434031.htm>).

2. Overall Labor Burden

- a. Total Number of Annual Responses: 300
- b. Total Labor Burden: \$ 492.25

13. Respondent Costs Other Than Burden Hour Costs

There are no additional costs, such as start-up or capital costs, to the respondents. Cost of returning the form is \$73.50 (150 forms x \$.49). Additional postage consists of mailing a copy of the death certificate is \$73.50 (150 x \$.49). Total cost is \$147.00 (\$73.50 + 73.50).

14. Cost to the Federal Government

a. Labor Cost to the Federal Government

	DD 2840, Request for Information Regarding Deceased Debtor (Probate Clerk)	Total
Number of Responses	150	150
Processing Time Per Response (in hours)	.083 hours (5 minutes)	.083 hours (5 minutes)
*Hourly Wage of Worker(s) Processing Responses (Federal Civil Service 2017 Pay Structure)	\$17.28	\$17.28
Cost to Process Each Response (Processing Time Per Response multiplied by Hourly Wage of Worker(s) Processing Responses)	\$1.43424	\$1.43424
Total Cost to Process Responses (Cost to Process Each Response multiplied by Number of Responses)	\$215.136	\$215.136

The hourly wage was determined by using the 2017 Federal Salary Table, GS-6, step 5 (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
	\$15.00	\$73.50				\$88.50

1. Total Operational and Maintenance Costs: \$88.50
2. Total Labor Costs to the Federal Government: \$215.136
3. Total Cost to the Federal Government: \$303.636

15. Reasons for Change in Burden

This is a reinstatement with change to an expired collection. The burden has decreased since the previous approval due to procedural changes. DFAS only completes a DD 2840 for debts over \$10,000, whereas before, the form was sent regardless of amount.

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.