

SUPPORTING STATEMENT – PART A

Army & Air Force Exchange Service **Exchange Official Personnel Folder - Privilege Card (0702-0129)**

1. Need for the Information Collection

The Army and Air Force Exchange Service (Exchange) is a Non-Appropriated Fund (NAF) instrumentality of the United States of America. Pursuant with Army Regulation 215-8/AFI 34-211(I) collection of information is required to enable the Exchange to carry out its mission to enhance the quality of life for authorized Exchange patrons. Patronage may include active duty members of the uniformed services, retired members and their dependents, National Guard personnel, and active Exchange associates and their dependents. This collection allows Exchange employee dependents and Exchange retirees the opportunity to become or remain eligible Exchange patrons.

The collection of information on Exchange Form 1100-016, Army & Air Force Exchange Service Identification & Privilege Card Application is authorized by Title 10 U.S.C. §3013, "Secretary of the Army," Title 10 U.S.C. §8013, "Secretary of the Air Force"; Army Regulation 215-8/AFI 34-211(I), "Army and Air Force Exchange Service Operations," and Executive Order 9397 (SSN), as amended.

2. Use of the Information

The Exchange Human Resource (HR) staff uses the information collected to provide authorized patronage to individuals, who are classified as: 1) dependent/family members to active Exchange associates or 2) Headquarters associates who are retiring from employment. These individuals must visit the Exchange HR directorate/office for completion of Exchange Form 1100-016.

When the form is completed, the individual returns it to an Exchange HR associate who then verifies the individual's identity as an approved dependent or an eligible Exchange retiree. If verification requirements are not fulfilled, the application for patronage is denied and Exchange Form 1100-016 is shredded, i.e. not maintained.

If verification is approved, the HR associate provides the individual with a personalized, laminated dependent card (DD Form 2574). The DD Form 2574 is not considered to be a collection instrument and does not require an OMB control number, as all information is collected on the Exchange Form 1100-016. The DD Form 2574 is simply a repository for information that is collected on the Exchange Form 1100-016. The completed Exchange Form 1100-016 is then transferred to another Exchange HR associate who scans the form into the Exchange employee's official personnel folder. The original paper form is then shredded and destroyed.

3. Use of Information Technology

The Exchange encourages respondents to utilize technology to the fullest extent possible in order to reduce burden on the public. However, because the forms require a witnessed signature there is currently no means to submit them electronically. The percentage of responses collected electronically is zero.

Once information is collected, Exchange Form 1100-016 is presented to an Exchange Human Resource associate, who verifies the information for accuracy and completeness. The associate then types information onto a dependent card (DD Form 2574) and presents it to the individual for final signature.

The associate rapidly inputs the collected information into an Exchange Information Technology System of Records housing the sponsored individual's Official Personnel Folder. This permits immediate access to the collected information for purposes in addressing individual's questions or following up on expiration dates of dependent privileges. The use of technology allows disclosure to the individual or their designee upon written request pursuant to the Privacy Act of 1974, as amended, Title 5 U.S.C. §552a, or for any investigatory or legal action as necessary.

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 Business

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

6. Less Frequent Collection

Information collected from members of the public is upon their request to obtain patronage. Collection is "as needed" or "on occasion". Less frequent collection is not possible.

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 Title 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 24, 2018. The 60-Day FRN citation is 83 FRN 53611. No comments were received during the 60-Day Period.

A 30-Day Federal Register Notice for the collection published on Wednesday, December 19, 2018. The 30-Day FRN citation is 83 FR 65155.

Part B: CONSULTATION

Significant input and information was received from the Exchange HR Directorate in relation to the continued use and burden relative to the collection of information. It was determined that the information is maintained in one database and used in accordance with Section 2 of this statement.

9. Gifts or Payment

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

10. Confidentiality

The Privacy Act of 1974, as amended protects the information collected. Respondents are assured confidentiality through a Privacy Act Statement printed on Form 1100-016. A copy of Form 1100-016 is provided. Physical entry restrictions enforced by locks and guards protects access to the information. Only authorized personnel with an official "need to know" who are responsible for servicing the record in performance of their official duties may access the records. Access to computerized data is role-based and further restricted by passwords, which are changed periodically. Integrity of automated data is ensured by internal audit procedures, database access accounting reports and controls to preclude unauthorized disclosure.

A draft copy of the altered SORN AAFES 0401.04, "Official Personnel Folder" has been provided with this package for OMB's review.

Enclosed is a copy of the Exchange Privacy Impact Assessment (PIA) for the electronic maintenance of information. The PIA may be viewed at <https://www.aafes.com/Images/AboutExchange/pia-opf.pdf>.

The records retention for the electronic saved information submitted with this collection is maintained for the life of the sponsored employee's official personnel file. System records are retained and disposed of according to both the National Archives and Records Administration (NARA) codified in 36 Code of Federal Regulations (CFR), Chapter XII, Subchapter B and the General Services Administration (GSA) regulations codified in 41 CFR Parts 201-2, 201-22 and 201-45. Disposition of electronic files is pending until the National Archives and Records Administration has approved the retention and disposition schedule, treat as permanent.

11. Sensitive Questions

In order to complete the dependent card (DD Form 2574), the respondents must provide the Exchange their gender, date of birth, eye and hair color, height, weight, and social security number. This collection is authorized by DoD 5400.11-R, C4. Justification for use of the SSN is provided.

12. Respondent Burden and its Labor Cost

a. Estimation of Respondent Burden

1. **Army & Air Force Exchange Service Identification & Privilege Card Application (Exchange Form 1100-016)**

- a. Number of Respondents: 2,500
- b. Number of Responses Per Respondent: 1
- c. Number of Total Annual Responses: 2,500
- d. Response Time: 15 minutes (.25/Hour)
- e. Respondent Burden Hours: 625 Hours

2. **Total Submission Burden**

- a. Total Number of Respondents: 2,500
- b. Total Number of Annual Responses: 2,500
- c. Total Respondent Burden Hours: 625 Hours

b. Labor Cost of Respondent Burden

1. **Army & Air Force Exchange Service Identification & Privilege Card Application (Exchange Form 1100-016)**

- a. Number of Total Annual Responses: 2,500
- b. Response Time: 15 Minutes (.25/hour)
- c. Respondent Hourly Wage: \$7.25/Hour
- d. Labor Burden per Response: \$1.8125
- e. Total Labor Burden: \$4,531.25

2. **Overall Labor Burden**

- a. Total Number of Annual Respondents: 2,500
- b. Total Labor Burden: \$4,531

We based our hourly burden on the current federal minimum wage (2018) posted at the Department of Labor Wage Website:

<http://webapps.dol.gov/elaws/elg/minwage.htm>

13. Respondent Costs Other Than Burden Hour Costs

There are no annualized costs to respondents other than the labor burden costs addressed in Section 12 of this document to complete this collection.

14. Cost to the Federal Government

a. Labor Cost to the Federal Government

1. **Army & Air Force Exchange Service Identification & Privilege Card Application (Exchange Form 1100-016)**

- a. Number of Total annual Responses: 2,500
- b. Processing Time per Response: 30 Minutes
- c. Hourly Wage of Worker(s) Processing Responses: \$24.00/Hour
- d. Cost to Process Each Response: \$12.00
- e. Total cost to Process Responses: \$30,000

2. **Overall Labor Burden to Federal Government**

- a. Total Number of Annual Responses: 2,500
- b. Total Labor Burden: \$30,000

The hourly wage of workers was determined by using the rounded mid-point wage of NF level 3 associates as displayed in the August 3, 2018 152 DFW Pay Band Schedule 033-49 listed at

<https://www.cpms.osd.mil/Content/NAF%20Schedules/survey-sch/152/152-033-49-NF.html> for Dallas, Texas. $(\text{Maximum Hourly Rate} - \text{Minimum Hourly Rate}) / 2 + (\text{Minimum Hourly Rate})$

b. Operational and Maintenance Cost

- a. Equipment: \$0
- b. Printing: \$0
- c. Postage: \$0
- d. Software Purchases: \$0
- e. Licensing Costs: \$0
- f. Other: \$46,026 (The Exchange does not maintain itemized records for the operational and maintenance cost associated with this collection. Other cost includes the average salary of IT System Support associates, necessary upgrades to equipment, printing of forms, and overhead costs such as utilities.
- g. Total: \$46,026

1. Total Operational and Maintenance Costs: \$46,026
2. Total Labor Costs to the Federal Government: \$30,000
3. Total Cost to the Federal Government: \$76,026

15. Reasons for Change in Burden

There has been no change in burden since the last approval. Consultations were held with the Exchange Human Resource directorate responsible for collection of information. It was determined there has been no increase or decrease in this collection. Individuals completing applications for dependent cards do not have an average increase in hourly pay. There has been no significant difference in Exchange hourly pay or operational and maintenance cost.

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.