

SUPPORTING STATEMENT - PART A

Application for the Review of Discharge or Dismissal from the Armed Forces of the United States 0704-0004

1. Need for the Information Collection

Under 10 U.S.C. § 1553 and DoD Directive 1332.41, "Boards for the Correction of Military Records (BCMRs) and Discharge Review Board (DRBs)," former Service members who received an administrative discharge have the right to appeal the characterization or reason for separation, provided they do so within 15 years from the date of separation. Accordingly, each Military Department has established a Board of Review to review appeals of former members of the Armed Forces. The DD Form 293, "Application for Review of Discharge from the Armed Forces of the United States" provides the respondent a vehicle to present to the DRB their reasons and justifications for a discharge upgrade as well as providing the Services the essential data needed to process the appeal. This information collection is needed to provide Service members a method to present to their respective Military Department Discharge Review Boards their reason/justification for a discharge upgrade, as well as, providing the Military Departments with the basic data need to process the appeal. The data collected is covered by the Systems of Record Notices correction of discharge review board and official military records maintained by each of the Military Departments (available <http://dpclo.defense.gov/Privacy/SORNs.aspx>).

2. Use of the Information

The primary purpose of this information is to identify the arguments of the respondents and justifications for requested relief, and secure their Official Military Personnel Files from the National Records Center, and it allows the respondent to explain the reasons for the alleged error or injustice, designate counsel of choice, select the method of hearing desired, and request a records review or personal hearing. This information is also used to correspond with the respondent and counsel regarding his or her appeal, to provide further clarification as needed, and updates on the status of the case. The respondents for this information collection are former members of the Military Departments requesting a change in the characterization of their discharge or the reason for their separation. Service members submit to their respective Service Discharge Review Board a DD Form 293. The respective Service Discharge Review Board (DRB) uses the information from the DD Form 293 in processing the respondent's discharge appeal authorized under 10 U.S.C. § 1553 and DoD Directive 1332.41. While in Service custody, this information is privileged and restricted to individuals who have a need for the record in the performance of their official duties.

Over the past three years, the information collected from the DD Form 293 has been used by the respective Service Discharge Review Boards to examine the propriety and equity of the respondents' discharge and to recommend any changes, if warranted.

3. Use of Information Technology

The DD Form 293 is available on Department of Defense forms website, <http://www.dtic.mil/whs/directives/infomgt/forms/eforms/dd0293.pdf>. For respondents who have access to computerized information technology, the DD Form 293 can be completed on-line before printing for signature. A signed DD Form 293 is required from each respondent that indicates the information provided is true and that the respondent has full knowledge of penalties involved for willfully making a false statement.

4. Non-duplication

There is no duplication. The DD Form 293 is used by all the Services for identical purposes. No similar information is readily available from which an individual appeal could be processed. The respondent must initiate the request and must provide personal information, including his or her name, address, social security number, branch of Service at discharge, discharge date, discharge characterization, unit and location at the time of discharge, change requested in and justification for change in discharge characterization or reason for discharge, whether he or she desires to appear before the Board, and supporting documentation for a discharge upgrade.

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

The respondent initiates a request for review and upgrade of his or her discharge by completing the requested information on the DD Form 293 and submitting it to the respective Service Discharge Review Board. The form, which implements Congressional intent under 10 U.S.C. §1553, is essential. If the form was not used, or if the information was not collected, the respondents would be unable to appeal to their respective Discharge Review Boards to request a change in their characterization of discharge or reason for separation. Without this collection of information, the Department of Defense would be unable to comply with the current law, Congressional intent would be frustrated, and former Service members and the public would lose confidence in the fairness of the military's administration of its personnel system.

7. Paperwork Reduction Act Guidelines (1 sentence)

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 (FRN) for the collection published on Tuesday, July 9, 2019. The 60-Day FRN citation is 84 FRN 32730.

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

A 30-Day Federal Register Notice for the collection published on Monday, September 16, 2019. The 30-Day FRN citation is 84 FRN 48602.

Part B: CONSULTATION

No additional consultation apart from soliciting public comments through the Federal Register 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

The collected information is used to process a respondent's appeal. During the processing, records are maintained in areas accessible only to authorized personnel. All data are protected by the Privacy Act of 1974 and are protected according to the regulations therein, and by related DoD directives and instructions.

Applicable SORNs:

Army

<http://dpclد.defense.gov/Privacy/SORNsIndex/DOD-wide-SORN-Article-View/Article/569933/a0015-34-ahrc/>

Navy and Marine Corps

<http://dpclد.defense.gov/Privacy/SORNsIndex/DOD-wide-SORN-Article-View/Article/570303/n01000-2/>

Air Force

<http://dpclد.defense.gov/Privacy/SORNsIndex/DOD-wide-SORN-Article-View/Article/569833/f036-safcb-a/>

Coast Guard

<http://www.gpo.gov/fdsys/pkg/FR-2011-10-28/html/2011-27881.htm>

A draft copy of the PIA, PIA title, has been provided with this package for OMB's review.

Control cards are permanent; maintain in current file area for 20 years then offer to National Archives and Records Administration, 700 Pennsylvania Avenue, NW., Washington, DC 20408. Approved requests result in the creation of an Official Military Personnel File, containing Certificate of Release or Discharge from Active Duty, Honorable Discharge Certificate, General Discharge Certificate, and/or Report of Casualty as appropriate, which is retired permanently, to National Personnel Records Center, 9700 Page Avenue, St. Louis, MO 63132-5100. Documentation relating to disapproved requests are maintained for 2 years then destroyed.

11. Sensitive Questions

No sensitive questions are asked in the collection. Respondents furnish only that information relevant and necessary to process their request.

Social Security Number (SSN): Is requested to ensure accuracy of data involving the specified individual applicant. The form states this information is voluntary; however, failure of the applicant to provide their SSN may delay the processing of the application.

Personal Identifying Information (PII): Respondents are advised that their data is for Official Use Only and will be maintained and used in strict confidence in accordance with Federal law and regulations and that the procedures are in place to protect the confidentiality of the information. The erroneous release of PII might cause legal action from individuals against DoD and/or the government. All personal information provided by the subject falls under the Privacy Act of 1974 and OMB Circular A-108.

12. Respondent Burden and its Labor Costs

Part A: ESTIMATION OF RESPONDENT BURDEN

(1) DD Form 293

Total annual respondents:	10,000
Frequency of response:	One-time
Total annual responses:	10,000
Burden per response:	45 minutes
Total burden hours:	7,500 hours

1) Total Submission Burden

- a) Total Number of Respondents: 10,000
- b) Total Number of Annual Responses: 10,000
- c) Total Respondent Burden Hours: 7,500 hours

Part B: LABOR COST OF RESPONDENT BURDEN

1) Collection Instrument(s)

DD From 293

- a) Number of Total Annual Responses: 10,000
- b) Response Time: 45 Mins
- c) Respondent Hourly Wage: \$7.25
- d) Labor Burden per Response (*P: B multiplied by C*): \$5.43
- e) Total Labor Burden (*P: A multiplied by B multiplied by C*): \$54,375

2) Overall Labor Burden

- a) Total Number of Annual Responses (*P: add all "a's" in this section*): 10,000
- b) Total Labor Burden (*P: add all "e's" in this section*): 54,375

Respondent hourly wage was determined by using the [Department of Labor Wage Website] (<http://www.dol.gov/dol/topic/wages/index.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. Printing individual forms on Federal Government computer printers:

$$10,000 \text{ forms} \times \$0.42 \text{ cents per form (4 sides)} = \$4200.00$$

- b. Photocopying and word processing (paper, toner, machines) of form, supporting documentation, and decisional documents for mailing and archiving:

$$10,000 \text{ forms} \times \$4.94 \text{ per decision} = \$49,400.00$$

- c. Mailing between offices and records repositories of form, records, advisory opinions, and decisional documents:

$$10,000 \times \$2.21 \text{ per applicant} = \$22,100.00$$

- d. Mailing decisional documents to respondents:

$$10,000 \times \$.44 \text{ (postage) per decision} = \$4,420.00$$

$$10,000 \times \$.10 \text{ (envelope) per decision} = \underline{\$1000.00}$$

TOTAL ANNUAL MATERIALS COST = \$146,000.00

e. Labor Costs:

The following estimate involving labor costs is based on the personnel structure at the Army Discharge Review Board, which is similar to the other Military Department Boards. Additionally, for each category, an average salary for the personnel was used to determine the hourly rate.

Examiner Staff:

4 staff at average \$33.65/hr x 7 hrs = \$ 942.20

Support Staff:

Screening and Processing

6 personnel at average \$15.65/hr x 6 hrs = \$ 563.40

Archiving and Promulgating

2 personnel at average \$19.51/hr x 1 hr = \$ 39.02

Mail Handling

2 personnel at average \$17.67 x ¼ hr = \$ 8.84

IT Technical Support

2 personnel at average \$28.29/hr x ¼ hr = \$ 14.15

Board Members:

5 board members at average \$70.00/hr x ¾ hr = \$ 262.50

Total Labor Cost Per Case = \$1830.11

TOTAL LABOR COST FOR 10,000 REpondents \$18,301,100

TOTAL COST TO THE GOVERNMENT \$18,466,000

15. Reasons for Change in Burden (1-7 sentences)
There has been no change in burden since the last approval.
16. Publication of Results (1 sentence/ 1 paragraph)

The results of this information collection will not be published.
17. Non-Display of OMB Expiration Date (1 sentence/ 1 paragraph)
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” (1 sentence)
We are not requesting any exemptions to the provisions stated in 5 CFR 1320.9.