

## SUPPORTING STATEMENT - PART A

Consent to Release Personal Information – 0703-XXXX

### 1. Need for the Information Collection

Navy Personnel Command (PERS-00C, Navy Casualty), is the Secretary of the Navy's office for the certification and administration of benefits in the event a Sailor is declared Duty Status, Whereabouts Unknown (DUSTWUN), Missing, or deceased – or incurs injuries or illness classified as Serious or Very Serious. Information is collected from Sailors' Next of Kin in order to appropriately provide benefits and entitlements, as well as process travel requests and release their contact information to members of Congress. Primary entitlements are directed by the following laws:

- Death Gratuity – 10 US Code §1475 directs the Secretary of the Navy to have a death gratuity paid to the designated survivor in the event of qualifying Sailor's death. In order to comply with this directive, Navy Casualty, acting for the Secretary, collects basic information from the beneficiary, to collect, submit and process claim for payment.

- Service Members' Group Life Insurance – 38 US Code § 1965-1980 outlines the Secretary of the Navy's requirement to make life insurance available to members of the armed forces. In order to process claims submitted under the program, Navy Casualty collects basic information from the named beneficiary to confirm eligibility, and to collect, adjudicate, and submit the claim for payment.

- Travel for funeral attendance – 37 US Code, 481f allows the Secretary of the Navy to provide transportation for eligible family members to attend deceased member's burial ceremonies. Navy Casualty collects pertinent information to secure travel arrangements on behalf of the bereaved, and to adjudicate claims for per diem, mileage, and other incidentals allowed by regulation.

- Travel for bedside attendance (for qualifying ill/injured) – 37 US Code §481h allows the Secretary of the Navy to provide transportation for three persons named by the qualifying ill or injured Service member to the bedside of the Service member. Navy Casualty collects pertinent information to secure travel arrangements on behalf of the travelers, and to adjudicate claims for per diem, mileage, and other incidentals allowed by regulation.

- Survivor Benefit Plan – 10 US Code 1447-1455 establishes the Survivor Benefit Plan. Specifically, section 1448 expanded the eligibility to surviving spouses of members who die on active duty. Navy Casualty collects basic information from the surviving spouse to confirm eligibility, and to collect, adjudicate, and submit the claim for payment.

DOD Instruction 1300.18, DoD Personnel Casualty Matters, Policies, and Procedures, states explicitly that casualty information is not to be released without consent of the next

of kin. Collection of this information, when consent is granted, is obtained solely to provide members of Congress with contact information to enable condolences to be passed to the family member(s) directly.

## 2. Use of the Information

The information collected is used solely for the purposes outlined above. Respondents for each of the forms described below will be family members and other individuals pertaining to a Sailor who dies or becomes seriously ill or injured. Responses are collected using OPNAV form 1770/1 "Consent to Release Information", OPNAV form 1770/2 "Next of Kin travel request", and OPNAV form 1770/3 "Next of Kin Information". The forms are completed in the presence of a Casualty Assistance Calls Officer (CACO), and the completed forms are retained by the CACO for submission to Navy Personnel Command, PERS-00C Navy Casualty.

Upon the death of a Sailor, the Navy sends a CACO to deliver in person notification to the Next of Kin of the deceased, and any other relative or non-relative (known as "family member", for discussion purposes) designated by the Sailor to receive one of the benefits listed above. Each CACO will discuss benefits information with the family member, and over the course of the next few visits, determine which of the forms are applicable to the family member's situation. Similarly, if a Sailor becomes seriously ill or injured, contact is made with immediate family members to discuss the details of the Sailors condition, and to expedite the arrangement of travel for up to three individuals to attend the bedside of the ill or injured Sailor.

OPNAV 1770/1 is completed by a spouse, parent or child of majority of a deceased Sailor to provide written permission to release their contact information to a member of Congress for condolence purposes.

OPNAV 1770/2 is completed by a qualifying family member, if they desire to travel to a funeral or command memorial of a deceased Sailor, or travel to the bedside of a seriously ill or injured Sailor.

OPNAV 1770/3 is completed for each Next of Kin and beneficiary in a deceased case. The form is used to collect pertinent data in order to process claims for benefits and entitlements.

Each form that requires completion is done so through an interactive session between the CACO and the family member. If the family member does not desire to complete a form at a certain meeting, the event is rescheduled. The CACO will not leave the form with the family to fill out – the Navy takes pride in direct assistance to family members, and the form is talked through and completed at a time convenient for the family member. Completed forms are forwarded to case managers at Navy Casualty, and stored electronically in the Defense Casualty Information Processing System (SORN A0600-8-1c AHRC DoD).

3. Use of Information Technology

No information is collected electronically. Data is collected by a designated Casualty Officer, in person, on the form. Data is collected in this manner, as the relationship between the Casualty officer and the surviving next of kin is a very sensitive matter – and this method of collection allows the casualty officer to answer any questions directly, about the information and its usage. Navy has no intention of modifying this method of data collection.

4. Non-duplication

The information obtained through this collection is unique and is not already available for use or adaptation from another cleared source. It is essential to have this accurate data for benefits processing and travel execution.

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

This data is only collected on occasion, upon the death or serious illness/injury to a Sailor.

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, June 26, 2019. The 60-Day FRN citation is 84 FR 30101.

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

A 30-Day Federal Register Notice for the collection published on Friday, November 15, 2019. The 60-Day FRN citation is 84 FRN 62517.

Part B: CONSULTATION

No additional consultation apart from soliciting public comments through the 60-Day Federal Register Noticed 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

A Privacy Act Statement is provided at the top of each form.

Two Systems of Records Notice are required:

SORN A0600-8-1c AHRC DoD, Defense Casualty Information Processing System (DCIPS) <http://dpcl.d.defense.gov/Privacy/SORNsIndex/DOD-Component-Notices/Army-Article-List/>

SORN N04650-1, Passenger Transportation System:

<http://dpcl.d.defense.gov/Privacy/SORNsIndex/DOD-wide-SORN-Article-View/Article/570352/n04650-1/>.

A Privacy Impact Assessment is required, and is not currently published. A draft copy of the PIA for the Defense Casualty Information Processing System (DCIPS) has been provided with this package for OMB review.

Records retention and disposition: A snapshot of the DCIPS master file is sent to the National Archives and Records Administration every two years (per SORN A0600-8-1c AHRC DoD). Legal custody of each snapshot will transfer to NARA when the record is 25 years old.

11. Sensitive Questions

Social security numbers are collected from next of kin (respondents) who:

- Request benefits associated with the death of a Sailor. Death Gratuity, Unpaid Pay and Allowances, and Survivor Benefit plan are paid by the Defense Finance and Accounting Service, and a full SSN is required to make payment

- Request travel arrangements to the funeral or memorial of a deceased Sailor, or to the bedside of a seriously ill or injured Sailor. The Defense Travel System, which is used to book commercial travel, requires the use of the SSN in support of current DHS and TSA policy.

An SSN justification memo is provided as a part of this ICR package.

12. Respondent Burden and its Labor Costs. Estimation of Respondent Burden

**1.a. OPNAV 1770/1 Consent to Release Personal Information**

- a. Number of Respondents: 600
- b. Number of Responses Per Respondent: 1
- c. Number of Total Annual Responses: 600
- d. Response Time: 30 minutes
- e. Respondent Burden Hours: 300 hours

**1.b. OPNAV 1770/2 Next of Kin Travel Request**

- a. Number of Respondents: 800
- b. Number of Responses Per Respondent: 1
- c. Number of Total Annual Responses: 800
- d. Response Time: 30 minutes
- e. Respondent Burden Hours: 400 hours

**1.c. OPNAV 1770/3 Next of Kin Identification**

- a. Number of Respondents: 600
- b. Number of Responses Per Respondent: 1
- c. Number of Total Annual Responses: 600
- d. Response Time: 1 hour
- e. Respondent Burden Hours: 600 hours

**2. Total Submission Burden**

- a. Total Number of Respondents: 800 (600 will complete all three forms, 200 more will complete form 1770/2)
- b. Total Number of Annual Responses: 800
- c. Total Respondent Burden Hours: 1300 hours

b. Labor Cost of Respondent Burden

**1.a. OPNAV 1770/1 Consent to Release Personal Information**

- a. Number of Total Annual Responses: 600
- b. Response Time: 30 minutes
- c. Respondent Hourly Wage: \$26.19
- d. Labor Burden per Response: \$13.10
- e. Total Labor Burden: \$7,857

**1.b. OPNAV 1770/2 Next of Kin Travel Request**

- a. Number of Total Annual Responses: 800
- b. Response Time: 30 minutes
- c. Respondent Hourly Wage: \$26.19
- d. Labor Burden per Response: \$13.10

e. Total Labor Burden: \$10,480

**1.c. OPNAV 1770/3 Next of Kin Identification**

a. Number of Total Annual Responses: 600

b. Response Time: 1 hour

c. Respondent Hourly Wage: \$26.19

d. Labor Burden per Response: \$26.19

e. Total Labor Burden: \$15,714

**2. Overall Labor Burden**

a. Total Number of Annual Responses: 2,000

b. Total Labor Burden: \$34,051

The 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. Labor Cost to the Federal Government**

**1.a. OPNAV 1770/1 Consent to Release Personal Information**

a. Number of Total Annual Responses: 600

b. Processing Time per Response: 30 minutes

c. Hourly Wage of Worker(s) Processing Responses: \$31.22

d. Cost to Process Each Response: \$15.61

e. Total Cost to Process Responses: \$9,366.00

**1.b. OPNAV 1770/2 Next of Kin Travel Request**

a. Number of Total Annual Responses: 800

b. Processing Time per Response: 30 minutes

c. Hourly Wage of Worker(s) Processing Responses: \$31.22

d. Cost to Process Each Response: \$15.61

e. Total Cost to Process Responses: \$12,488.00

**1.c. OPNAV 1770/3 Next of Kin Identification**

a. Number of Total Annual Responses: 600

b. Processing Time per Response: 1 hour

c. Hourly Wage of Worker(s) Processing Responses: \$31.22

- d. Cost to Process Each Response: \$31.22
- e. Total Cost to Process Responses: \$18,732.00

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

- a. Total Number of Annual Responses: 2,000
- b. Total Labor Burden: \$40,586.00

**b. Operational and Maintenance Costs**

- a. Equipment: \$0.00
- b. Printing: \$49.40
- c. Postage: \$0.00
- d. Software Purchases: \$0.00
- e. Licensing Costs: \$0.00
- f. Other: \$0.00
- g. Total: \$49.40

- 1. Total Operational and Maintenance Costs: \$49.50
- 2. Total Labor Cost to the Federal Government: \$40,586.00
- 3. Total Cost to the Federal Government: \$40,635.50

15. Reasons for Change in Burden

This is a new collection with a new associated burden.

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.